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AGREEMENT

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EPA

July 23, 1982

TO REVIEWER:

The Montana/Environmental Protection Agency (MEA) is enclosed for your review and/or comment. The following errata and omissions should be considered in your review.

Page 6	Par. 4b	"Inventory"
Page 23	Par. 2	End-of-year FY 1982
Page 27	Par. 2	Delete entire paragraph and substitute the following priorities:

2. Air

- Interim development and implementation of lead SIP (East Helena).
- Continue development and implementation of control strategies for previously approved or pending nonattainment SIP's.
- Continue ongoing air pollution control programs such as PSD, inspections, monitoring network and quality assurance plans.
- Quantify SO_2 emissions associated with oil well flaring in Williston Basin. Develop control strategy, if required.

Page 28	Par. 3 & 4	Delete both paragraphs entirely and substitute the following priorities:

3. Solid and Hazardous Waste Management

- Phase II Program Implementation - Develop, receive EPA authorization for, and implement permitting phase.
- Superfund Activitites - Investigate seven CERCLA candidate sites and request their consideration on EPA's list of national priority sites.

4. Pesticides

- Maintain the quality pesticide enforcement and laboratory programs.
- Emphasize the resolution of special pesticide enforcement problems including the drift of pesticides and the disposal of pesticides and their container.
- Establish a pesticide priority evaluation rating system (special emphasis on restricted pesticides), for the established comprehensive pesticide enforcement program and continue an environmental monitoring program to establish baseline pesticide residue levels.

Assuming final adoption of state groundwater regulations, activities in the initial phase of implementation will consist of development of permit application and processing procedures. Specific groundwater classification efforts will be conducted only as required for permit preparation. Resources to operate the program will come from permit effort charges and a general [illegible] classification effort in-depth resource capabilities.

[illegible] Page 5 - Department of Public Water Supplies, 1st par.

[illegible] cooperative investigations of suspected [illegible] customers by contacting appropriate [illegible] and classifications. Positive identification to be followed with assistance toward corrective measures.

If you wish to comment on the material in the MCR you may do so until [illegible], 1985. Your comments should be sent to either:

[illegible]
[illegible]
[illegible]
[illegible], MT [illegible]

or

[illegible]
[illegible]
[illegible]
[illegible], MT [illegible]

MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

Agreement on the Management and Administration
of Montana's Environmental Programs
for Federal Fiscal Year 1983

September 1982

Approved:

The undersigned hereby execute this Agreement on the Management and Administration of Montana's Fiscal Year 1983 Water Pollution Control, Safe Drinking Water, Air Quality, Solid Waste Management, Radiation and Pesticides Programs.

State of Montana

_____ _____

Ted Schwinden
Governor
State of Montana

Date

_____ _____

John J. Drynan, M.D., Director
Department of Health and
Environmental Sciences

Date

_____ _____

W. Gordon McOmber, Director
Department of Agriculture

Date

Environmental Protection Agency

_____ _____

Steven L. Durham
Regional Administrator

Date

_____ _____

Max H. Dodson, Director
Montana Office

Date

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INTRODUCTION

The primary goal of Montana's environmental health programs is to protect public health while sustaining a spirit of cooperation between environmental protection and resource development. Accomplishing this requires close coordination between the Departments of Health and Environmental Sciences (DHES) and Agriculture (DOA) for the state, and the federal government's Environmental Protection Agency (EPA).

Through grants, research, monitoring, technical expertise and other areas of cooperation, the DHES, DOA and EPA have taken lead roles in helping Montanans maintain their quality of life. The Montana/EPA Agreement (MEA) contributes to this process by consolidating all applications and narratives into one document, thus reducing paperwork and duplication of effort.

The MEA programs are comprised of DOA's pesticide program; DHES's air, water, radiation and solid waste management programs, and EPA's toxics and underground injection control programs.

The elements of the MEA include: (1) An overview of the state's environment, (2) identification of objectives, (3) strategies to accomplish priorities and (4) detailed work plans, activities and commitments.

PROGRAM ENVIRONMENTAL SUMMARIES

The environmental problems in the state of Montana are as diverse as its geography. For this reason the precise definition of problems is an evolutionary process. As more resources and expertise become available, the more thorough problem definition becomes.

Presently most physical and chemical surface water quality conditions are generally known throughout the state. The first phase of comprehensive biological monitoring has been completed, with second phase sampling beginning in FY 1983. Lake classification work under an EPA Section 314 Grant is in its final phase. Fisheries classification work has been recently completed by the Department of Fish, Wildlife and Parks (DFWP). The inventorying of drinking water supplies has been a continuing effort, with the majority of supplies investigated during 1978-79.

In Montana, as throughout the United States, a major emphasis is being placed upon the proper management of hazardous wastes. During fiscal year 1983, a comprehensive investigation will continue to determine the extent of the hazardous waste problem and to establish the mechanism to properly deal with that problem. Through the next fiscal year, the extent of the solid waste problems will continue to be evaluated through such means as the open dump inventory.

Air quality problems related to sulfur dioxide (SO2) have been defined for East Helena and are nearing completion for Billings during

FY 1983. East Helena should attain the ambient air quality standards by the end of FY 1983.

Total suspended particulate (TSP) problems have been located. Butte and Missoula will require implementation of control strategies for TSP. East Helena, Columbia Falls, Colstrip and Billings will continue to implement TSP control strategies in FY 1983.

Carbon monoxide (CO) problems exist in at least three major cities (Billings, Great Falls and Missoula). In order to determine the extent of the CO problem, additional data must be collected and modeling performed in Missoula and Great Falls.

The extent of lead concentrations in East Helena was well defined in FY 1982. Control strategies will be defined and implemented in FY 1983. New source air quality impacts related to energy production and mining are undergoing monitoring and evaluation to prevent significant deterioration.

Groundwater data have historically been limited. The major initiative for FY 1983 will be EPA's inventorying of underground injection control techniques and groundwater resources, and the state's implementation of its proposed groundwater regulations.

Human exposure to elevated levels of natural radioactivity has been defined, particularly in mineralized areas of western Montana. Studies to determine the extent, magnitude and sources of these exposures are underway.

Summaries of individual program area activities follow:

Water Quality

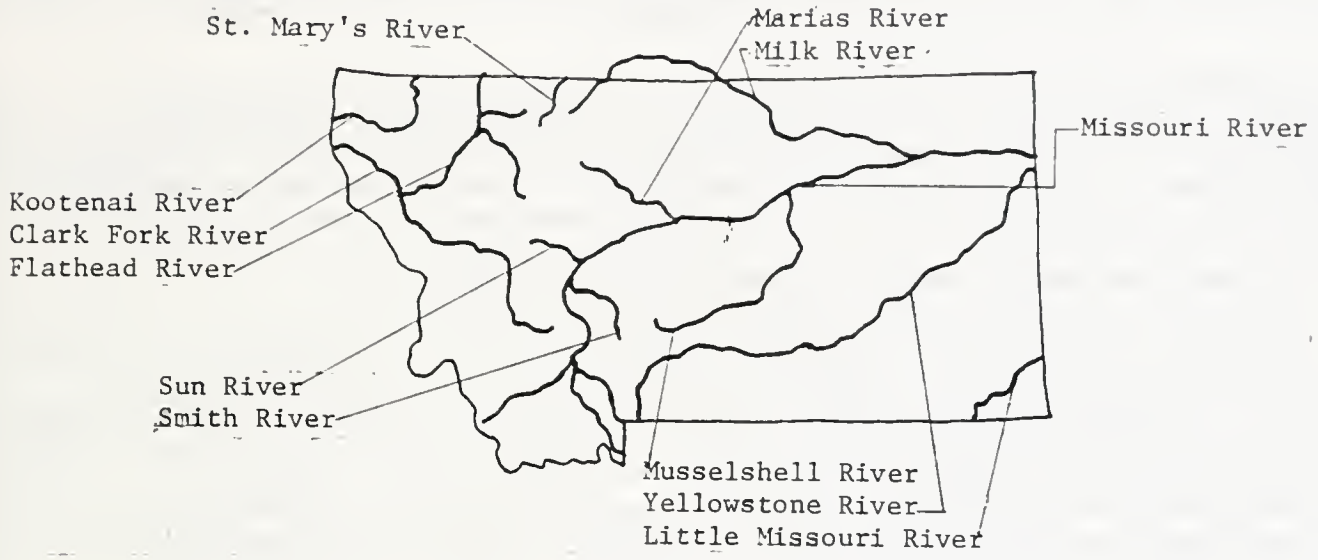
Planning, Monitoring and Management

From parched plains to snow-capped peaks, there is no typical Montana water. The warm, sometimes salty and silt-laden prairie stream is as much a feature of Montana's natural resource inventory as the crystalline and icy mountain cascade. Superimposed over this broad spectrum of water quality are the activites and effluents of a largely rural Twentieth Century American society.

Historically, the state's efforts to curb pollution have centered on end-of-the-pipe or process control. Great strides have been made in the cleanup of municipal and industrial discharges in recent years. Much of this progress is attributable to a fair but enforceable set of water quality standards, permits issued under the Montana Pollutant Discharge Elimination System (MPDES), the federally-subsidized Construction Grants Program for wastewater treatment plants and an improving atmosphere of cooperation between water users and regulatory agencies to reduce degradation. Less than 10 percent of the stream miles degraded by point sources in 1960 are degraded today. Virtually all of the remaining point-source water quality problems in Montana

have been identified and plans are being made for their eventual elimination.

Figure 1. Major Streams and Basins



Our knowledge of non-point-source pollution, embryonic before passage of the 1972 Federal Water Pollution Control Act Amendments, is finally coming of age. With the wholesale shift in program emphasis identified in Section 208 and the accompanying injection of federal funds, knowledge of non-point pollution in Montana is now on a par with knowledge of point-source pollution. Thanks to a battery of water quality assessments performed by scores of conservation districts, areawide organizations, Indian tribes and state and federal agencies, the massive non-point pollution picture is at last coming into focus.

Early in 1982 the Water Quality Bureau (WQB) first attempted a rigorous and systematic ranking of apparent and potential problem stream segments in Montana. Using all of the water quality assessments on hand, many of them produced during the course of the 208 program, WQB identified 216 apparent and potential problem stream segments. Of these, 99 segments had water quality data in EPA's storeage-retrieval system (STORET) and therefore could be ranked numerically and objectively.

Data from representative stations on these segments were sent to Denver, where EPA's Region VIII office performed a computerized severity analysis for each segment. The analysis produced a severity index that was based on the degree and frequency by which water quality criteria were exceeded for a total of five beneficial uses.

Two-thirds of the 99 segments with data either had a severity index of zero, meaning "no problem," or their problems were determined to be largely natural in origin and therefore not remediable under existing pollution control programs. About one-third or 32 of the 99 segments with data had non-zero severity indexes and had problems that are largely man-caused and remediable under existing regulatory authority and pollution control programs.

Montana's "Big Three" water quality problems are dewatering, sediment and salinity. Soil and water conservation districts have identified 873 miles of dewatered streams in Montana. The infamous Muddy Creek of the Sun River is Montana's showcase sediment problem, but there are scores of others. Saline seep and its effects are common knowledge among water professionals in the state and, like erosion and sediment, they need no further elaboration.

Non-point source water quality problems often transcend political and property boundaries. They are, moreover, often compounded by resource mismanagement in two or more categorical areas. For example, Prickly Pear Creek near Helena, one of Montana's five poorest quality streams, passes through two counties, two conservation districts, several towns and subdivisions, holdings of the U.S. Forest Service and the Bureau of Land Management, and numerous private properties, both individual and corporate. Its problems stem from mining and mineral processing, from urban runoff and municipal wastewater discharges and from livestock overuse and excess water diversion for irrigation. Problems of such complexity require cooperation and a united effort for their solution.

Ambient, fixed-station water quality monitoring in Montana is performed primarily by the Water Resources Division of the U.S. Geological Survey (USGS), which does contract monitoring for a number of state and federal agencies. The current USGS water quality monitoring network numbers about 75 stations statewide. Stations are being eliminated and sampling frequencies are being reduced because of deep cuts in many agency monitoring budgets. The WQB has adopted seven of the USGS NASQAN (National Stream Quality Accounting Network) stations as the core of its own fixed-station monitoring program. The WQB performs its own monthly monitoring on the Clark Fork River at Deer Lodge. The upper Clark Fork River has experienced a tremendous improvement in water quality over the past 15 years, which could be lost in a twinkling of an eye if elaborate wastewater treatment practices are abandoned along with the remaining mining enterprises in the Butte/Anaconda area.

Baseline biological conditions have been established at 85 sites on 59 streams statewide. The Biological Monitoring Program has established biological norms for a variety of streams, demonstrated that eastern Montana streams have biological communities that are just as diverse as those in western Montana streams, and revealed that certain western streams are much more sensitive to acid deposition, acid-mine drainage and heavy metals pollution than the others. The first follow-up sampling was conducted in 1980 and analyses were

completed in FY 1982. Future visits will be scheduled once statistical problems are resolved, time and resources permitting.

Intensive surveys, a mobile and customized form of fixed-station monitoring, are scheduled periodically to provide specific information to other WQB programs. Nineteen intensive surveys were completed in FY 82 and about 15 more are scheduled for FY 83.

Although municipal and industrial discharges do degrade water quality, the WQB has identified and does require permits for all discharges. Major industrial discharges are monitored or inspected at least twice each fiscal year; major municipal discharges are monitored or inspected at least once each year.

In accordance with the Statewide 208 Plan, the WQB Water Quality Management Planning program has been helping conservation districts and state and federal agencies to identify and correct their most serious nonpoint-source water quality problems. Most of these problems stem from improper agricultural, forestry and mining activities and they account for the lion's share of degraded stream segments in Montana. Planning grants were made to five conservation districts and three state agencies in FY 1982. Five of these grants will be continued in FY 1983 along with a new grant to the Rosebud County Conservation District.

Primary accomplishments during FY 1982 were as follows:

1. Activity Continued on the following special projects:

    a. Montana Department of State Lands (DSL) Forestry Division - Watershed Improvement Project: The project was converted from an on-site watershed improvement project to one directed at teaching loggers, foresters and private forest owners harvesting techniques that protect water quality. The change was made because of the current slump in timber harvest.

    b. DSL Evaluation of Water Quality Impacts From Active Hard Rock Mining operations - The Montana DSL Reclamation Division contract was redirected to allow joint inspections of placer mining operations in western Montana and to educate placer miners on construction of sedimentation ponds. The change was made in order to work more effectively in the area of placer mining.

    c. Department of Natural Resources and Conservation, Conservation Districts Division Continuing Contract - This contract is aimed at providing assistance to conservation districts in implementing their long-range water quality plans. A highlight of this effort in FY 1982 was a review of the 310 law and model rules, which many districts were having trouble administering.

d. Rosebud County Conservation District - Irrigation return flow water quality management project.

e. Park County Conservation District - Assisted with a streambank features inventory on the Shields River.

f. Hill County Conservation District - Beaver Creek water quality improvement project.

g. Lewis and Clark County Conservation District - Stream corridor management program.

h. Green Mountain Conservation District - Development of a water quality protection ordinance.

i. Jefferson Valley Conservation District - Stabilization study of Pipestone Creek.

j. Cascade County Conservation District - Muddy Creek special water quality project.

2. Three water quality appraisal studies were completed for the Muddy Creek Task Force:

   a. Muddy Creek/wastewater drain nutrient study;

   b. Muddy Creek/Sun River biological impact study;

   c. Muddy Creek/Freezeout Lake surge relief study.

3. Two water quality appraisal studies were initiated to establish pre-implementation water quality conditions for conservation districts special projects:

   a. Bluewater Creek Water Quality Improvement Project

   b. Pipestone Creek Stabilization Project.

4. Hydrologic assistance was provided on two conservation districts special projects:

   a. Beaver Creek Water Quality Improvement Project

   b. Shields River Streámbank In& &&ory

5. The Montana Bureau of Mines and Geology completed and delivered to WQB their contract report on the water quality effects of saline seep drainage in three seep-prone areas of Montana.

6. Completed a draft application for a flow reservation on the upper Clark Fork River.

7. Monitored water development activities on the Yellowstone River with reference to the DHES instream reservation.

8. Participated in a comprehensive survey of placer mining in western Montana.

9. Suffered resignations by two professional people, which resulted in staff vacancies for most of the year (a loss, not an accomplishment).

Monitoring

- Conducted monthly water quality monitoring on the Clark Fork River at Deer Lodge.

- Funded bimonthly monitoring by USGS of COD and TSS at seven NASQAN sites.

- Completed analysis of biological monitoring samples collected in 1980.

- Conducted or participated in 12 intensive surveys in addition to those performed for the Water Quality Managmeent Planning Program.

- Prepared 1982 305(b) report

- Maintained an approved quality assurance program.

- Made timely entries of WQB monitoring data into STORET.

- Completed evaluation of fish tissue analyses for Endrin, heavy metals and other toxics in fish from selected stations.

Drinking Water

The initial Montana law relating to public water supplies was originally enacted in 1907. This law was revised in 1977 and again in 1979 to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act " (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have at least 10 service connections or serve 25 individuals daily for at least 60 days a year.

The public water supply (PWS) inventory varies, but usually includes about 600 community water systems and 1,300 non-community water systems.

From a quality standpoint, the state's drinking water is considered generally good in western Montana. Those supplies in eastern Montana, particularly groundwater, would be considered poor. The exceptions in western Montana are those waters high in turbidity.

In the eastern part of the state, the communities using surface supplies, with few execptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids. Some of the smaller supplies have fluorides and nitrates which exceed the maximum contaminant level (MCL). The following information identifies, on a statewide basis, the fluoride, nitrate, arsenic, selenium and turbidity problems in the state. Some of these systems are planning improvements to their systems which will enable them to meet the M.C.L.

The vast majority of Montana's public water supplies are monitoring for bacteriological quality on a regular basis. The maximum concentration level for coliform bacteria is rarely exceeded. When it is, WQB engineers work with Public Water Supply (PWS) personnel to identify and solve the problem.

A program of radiological monitoring of water was developed last year and is now being implemented. Quarterly samples are being composited from community PWS's and will be analyzed later this year.

Community Public Water Supplies Which Exceed MCL's:

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminant Level (MCL)
Ashland	Fluoride	4.2	2.4
Franchi's Trailer Court Boulder		9.5	
Circle		5.6	
Lambert		4.5	
Geraldine		2.9	
Richey		4.4	
Highland Park, Glendive		3.8	
Spring Grove Tr. Ct., Glendive		3.3	
Cheeks Tr. Ct., Glendive		3.8	
Alta Tr. Ct., Miles City		3.8	
Bill's Trailer Villa, Miles City		2.6	
Greenstar Mobile Home Village, Miles City		3.0	
Palisade Apartments Miles City		2.5	
U.S. Livestock Station Miles City		2.6	
Wagon Wheel Motel Miles City		2.6	
Thiel Valley Water, Sidney		5.1	

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminant Level(MCL)
Wagon Wheele Tr. Ct., Forsyth		2.6	
M & R Mobile Home Village, Fairview		5.0	
Wagon Wheel Tr. Ct., Forsyth		5.5	
Winnett		3.1	
Flaxville	Nitrate	34.0	10.0 as NO3-N
Rapelje		13.0	
Coffee Creek		14.0	
Denton		13.0	
Aldrich Springs Conrad		25.0	
King Colony Lewistown		14.0	
Rockport Colony Pendroy		62.0	
Turner Colony, Turner		35.5	
Front Street Supply Milltown	Arsenic	0.20	0.05
Rapelje	Selenium	0.04	0.01
Glendale Colony Cut Bank		0.05	

Community Public Water Supplies which utilize surface water and have exceeded the maximum contaminant level of 1.0 N.T.U. (Nephelometric Turbidity Units) for a monthly average.

Bozeman
Tiber County Water District, Conrad
Helena (Ten Mile System)
Neihart
Ronan
East Glacier
Sheridan

Some of the past year's primary accomplishments in the drinking water program include:

- Improvements in filing, record keeping and tracking of PWS compliance.
- The DHES legal staff is being more effectively utilized in enforcement actions.
- The drinking water regulations have been rewritten and adopted by the Board of Health.

- A great deal of progress has been made toward bringing noncommunity PWS's into compliance with the law and regulations.

- Several systems are in the process of making the improvements necessary to meet the turbidity standards.

- Waivers to 5.0 NTU have been given to those systems who qualify for them.

- The operator training program has developed a joint training program with the Montana Rural Water Users Association.

- More on-site inspections are being performed on systems with problems.

- A new word processor has increased office efficiency.

- A radiological monitoring program is in progress.

- Coordination will continue of the department plan review.

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The state has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans. Federal grants on projects have increased from 30 percent to 75 percent (85 percent where the project uses innovative or alternative treatment mechanisms such as land disposal) of eligible project costs.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

During FY 82 the Municipal Wastewater Treatment Construction Grants Amendments of 1981 (PL 97-117) were passed that changed the entire grants program. The program went from a three step program (i.e. Step 1 - Facility Planning, Step 2 - Design and Step 3 - Construction) to a program where only one grant (Step 3 - Construction) is offered and within that grant an allowance is given to cover a portion of the costs of facility planning and design. There is an exception where small, needy communities may receive an advance for the facility planning and design should the state decide these communities qualify. Numerous other changes make the program more flexible and should allow for added state and local discretion.

Funding for the construction grants program has not been appropriated for FY 1982. PL 97-117 authorized funding of the grants program for four years at $2.4 billion per year. The authorization,

should it be appropriated, would give Montana approximately $12 milion per year. Such an appropriation would allow funding of four to six projects per year. This number is dependent on the cost of the projects that rank the highest on the state priority list.

Primary accomplishments in the Construction Grants Program in FY 1982 included:

The state has been fully delegated the construction grants program. During FY 82, EPA has gone to a true after-the-fact oversight procedure for the monitoring of the state program. The state has actively participated in the EPA Management and Evaluation System (MES) and will continue to participate in this program or the proposed water accountability system.

- Total obligations of approximately $25 million (without FY 82 appropriation).

- FY 1982 priority list developed.

- FY 1981 program evaluation completed by EPA.

Wastewater Discharge Permit Program

Montana's wastewater discharge permit program began in 1968. With passage of PL 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort. EPA established wastewater discharge limitations for the various categories. Where these limitations do not allow the meeting of water quality standards (including nondegradation of high quality waters by new discharges or existing industries), stricter limitations are imposed.

Tables #1 and #2 list the various categories of major and minor industrial wastewater discharges and their present status with regard to compliance and enforcement. Most of the projects shown as inactive have eliminated their discharges to surface waters and therefore, do not need a wastewater discharge permit.

Table #3 lists the status of the municipal discharges. Montana's five largest cities (Billings, Great Falls, Butte, Missoula and Helena) all have treatment facilities capable of meeting effluent limitations except for chlorine residual and fecal coliform bacteria. There are discharge limitations on chlorine residual because of its toxic effect on aquatic life, and meeting these limitations sometimes does not allow the municipality to meet the fecal coliform limits. Some coliform limits may be revised based on receiving stream flows and will still meet water quality standards.

Many of the communities meeting discharge limitations still have treatment facility needs. For example, Helena, Kalispell and Missoula all need improvements to their sludge disposal systems. Helena and

Kalispell had serious odor problems due to present sludge disposal practices, but are implementing land injection as an interim solution. The discharge standards for sewage lagoons were relaxed by EPA and, hopefully, this will allow many of the smaller communities to meet effluent limitations with a minimum amount of improvements.

It should be noted that essentially all dischargers (including those not in compliance) have constructed substantial treatment facilities during the last 25 years. The large percentage of noncompliance of major industrial dischargers versus the low percentage of minor dischargers is partially due to their more complex treatment facilities and greater bureau review on those that have the potential to do the most serious stream damage.

Table 1. Status of Major Industrial Wastewater Discharge Permittees

Category	Total No.	Active	Inactive	Substantially In Compliance	Not In Compliance
Major					
Sugar Refining	2	2		2	
Coal Mines	3	3	0	3	0
Smelter	3	3	0	1	2 (note 1
Plywood Mills	2	2	0	2	0
Oil Refineries	4	4	0	2	2 (note 2
Paper Mills	1	1	0	1	0
Generating Plants	2	2	0	2	0
Ore Mining	2	2	0	2	0
Railroads	1	1		1	
Meat Packing	1	1		1	
Totals	21	21	0	17	4

1. Anaconda-Warm Springs - Smelter now closed. Discharge from housekeeping and other minor industrial activity is significantly less than before shutdown and is not expected to cause water quality standard or modified permit violations. Anaconda-Butte - A compliance schedule for corrective action. Anaconda - Great Falls - Refinery closed. Permit concentration limits often violated.

2. Exxon and Farmers Union - Operating on compliance schedules.

Table 2. Status of Minor Industrial Wastewater Permittees

	Active	In Compliance	Not in Compliance	Notes
Fish Farms	20	20	0	
Irrigators	0	0	0	Considered nonpoint sources under Federal legislation.
Feed Lots	81	81	0	See note 1 below.
Oil Wells	10	10	0	
Mines	120	120	0	
Smelters	1	1	0	
Dairies	0	0	0	
Railroads	6	6	0	
Lumber & Plywood Mills	1	1	0	
Oil Refineries	1	1	0	
Highway Projects	12	12	0	
Sand & Gravel	5	5	0	
Slaughter Plants	1	1	0	
Cement Plants	2	2	0	
Chemical Plants	1	1	0	
Generating Plants	1	1	0	
Industrial Sewage Treatment Plants	8	8	0	Mt. Power Dam Plants.
Miscellaneous	15	15	0	
Totals	285	285	0	

1. Includes 41 smaller feed lots active on state permit program, but not included as part of federal permit program.

Table 3. Status of Municipal and Federal Wastewater Discharges

	Substantially In Compliance		Not in Compliance With Secondary Treatment Standards	
Sewage Treatment Facilities	Major	Minor	Major	Minor
Municipal & State	14	50	12	25
Federal & Indian	-	14	1	4
Totals	14	64*	13	29
Water Treatment Facilities/Waste-water Disposal				
Municipal	-	10	-	4
Federal & Indian	-	1	-	0
Totals		11*		4

*About 1/2 of these have no surface water discharges.

Primary accomplishments in the program for FY 1982 were:

- Approximately 135 new permits were issued.
- General permit program regulations were developed and passed by the Montana Board of Health.
- A new draft of groundwater regulations was developed and presented to the public at three public meetings across the state.
- Approximately 25 sets of plans for mill tailing ponds, leach pads and other similar proposals were reviewed.
- Completed compliance sampling inspections as outlined in FY 82 SEA.
- Approximately 150 complaints were received and processed.
- Six Violation Report Forms were sent to the DHES Legal Division requesting assistance.
- Six Notices of Violation and Orders to Take Corrective Action were issued.
- Two civil complaints, including requests for assessment of civil penalty and corrective action, were filed.
- Two civil complaints were settled, resulting in corrective actions and collection of $21,755.53 in civil penalties.
- Three complaints with a civil penalty are pending resolution.
- Approximately 70 preliminary enforcement letters were sent and included notices of violation of permit requirements and requests for corrective actions.
- Three sets of plans were reviewed for qualification for preferential tax classification.
- Approximately 225 enforcement conferences were held for the purposes of negotiating, developing cases, preparing for court appearances and setting policies, priorities and objectives.

Looking to FY 1983 and the issuance of new permits, the WQB expects many applications from new mining operations, most of which will be for discharging into high quality waters. There has been a rise in the number of applications in the beneficial use subcategory for discharge of water from oil producing wells. There will also be applications from saline seep areas for discharge of saline waters. It is highly unlikely that many of these saline discharges will be

allowed, due to their potential impact on surface waters. There will also be several permit applications for highway contractors to pump water from forms used in bridge pier construction. Applications are expected from new energy developments such as power plants, synfuel plants, pipelines and alternative energy sources as well.

The WQB's major jobs in the permit area will be assuring that permittees are complying with existing permits, and to get the new applications processed. As an aid in processing large numbers of applications in such categories as bridge cofferdams, suction dredge mining, placer mining and feed lots, the WQB has developed general permit program regulations and will attempt to develop general permits in these areas.

Air Quality

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions and natural sources of contamination, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from fireplaces and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

In FY 1982 implementation plans have been developed and are being carried out for all areas save East Helena (lead) and Great Falls (carbon monoxide). The extent of the lead problem in East Helena has been identified. Work is underway in developing control strategies to reduce lead concentrations to acceptable levels. Great Falls is proceeding with the carbon monoxide evaluation. Control strategies will be identified in the near future.

A plan to control TSP in Butte will be submitted by the end of the 1982 calendar year. Submission of this plan has been delayed because the control strategy initially envisioned proved infeasible.

A study is presently underway in Billings to define the nature and extent of sulfur dioxide concentrations. The study will be completed by the end of calendar year 1982. If violations of the ambient air quality standards exist, the area will be designated as nonattainment and an implementation plan will be developed.

The AQB processed more than 100 permits to assure that new air pollution sources comply with all air quality rules and standards. The DHES performed in excess of 17,000 laboratory analyses on 4,000 samples to evaluate the effects and levels of air pollution. It

analyzed 149,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through 150 field surveillance actions.

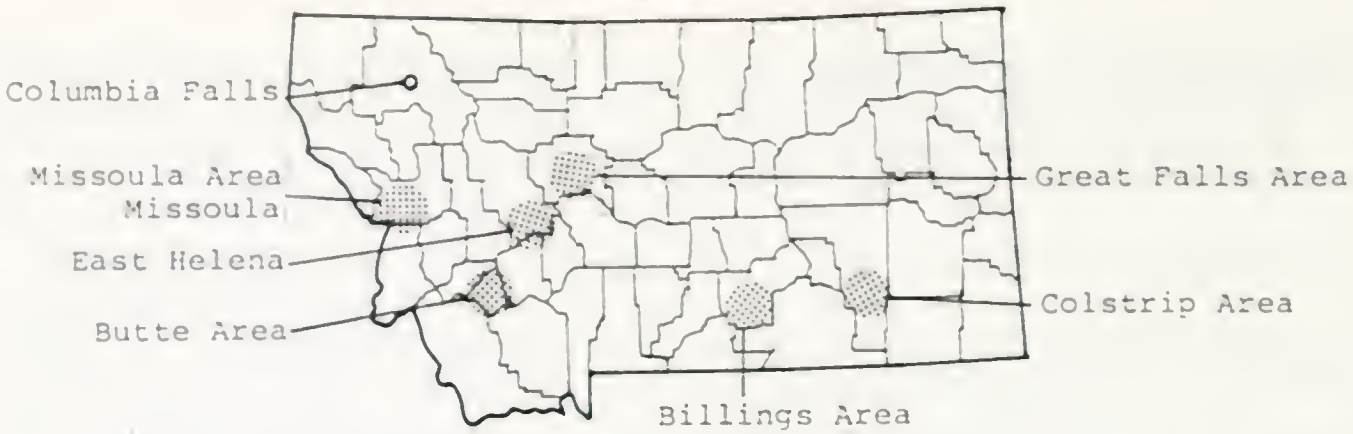
Montana's ambient air monitoring network was reviewed and modified as necessary.

Changes in permit and PSD rules were completed in order to obtain a fully approved implementation plan.

Only the towns and areas identified in the following maps and tables are not in compliance with primary or secondary air quality standards. The remainder of the state meets the standards or is unclassified. Additionally, the entire state appears to meet the standards for nitrogen dioxide and ozone.

As stated earlier, plans have been developed and are being implemented for all nonattainment areas except Butte (TSP), East Helena (lead) and Great Falls (carbon monoxide).

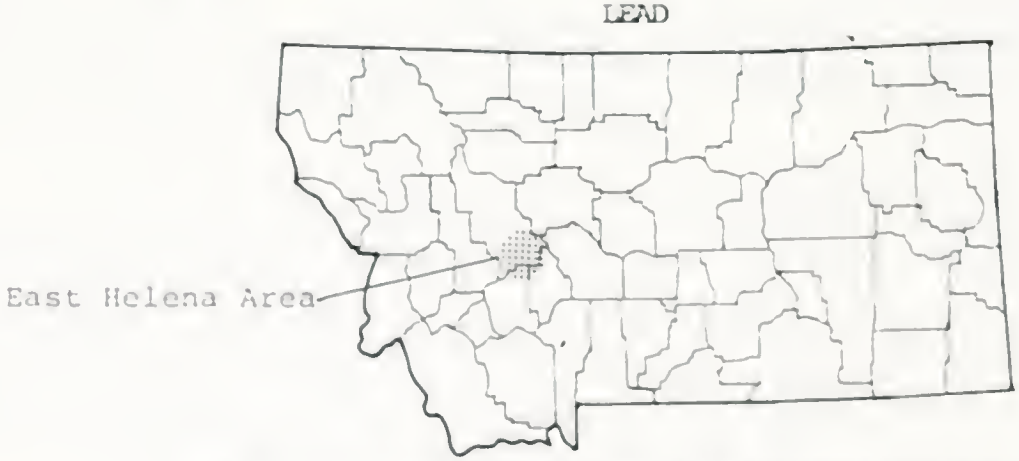
TOTAL SUSPENDED PARTICULATE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Colstrip Area	X		Street Dust and Strip Mining
Columbia Falls	X		Street Dust
Missoula	X		Street Dust, Smoke From Fireplaces and Industry
Missoula Area		X	Unpaved Rural Roads and Industry
Billings Area		X	Street Dust
Great Falls Area		X	Street Dust
Butte Area	X*		Street Dust and Mining Operation
East Helena		X	Street Dust and Industry

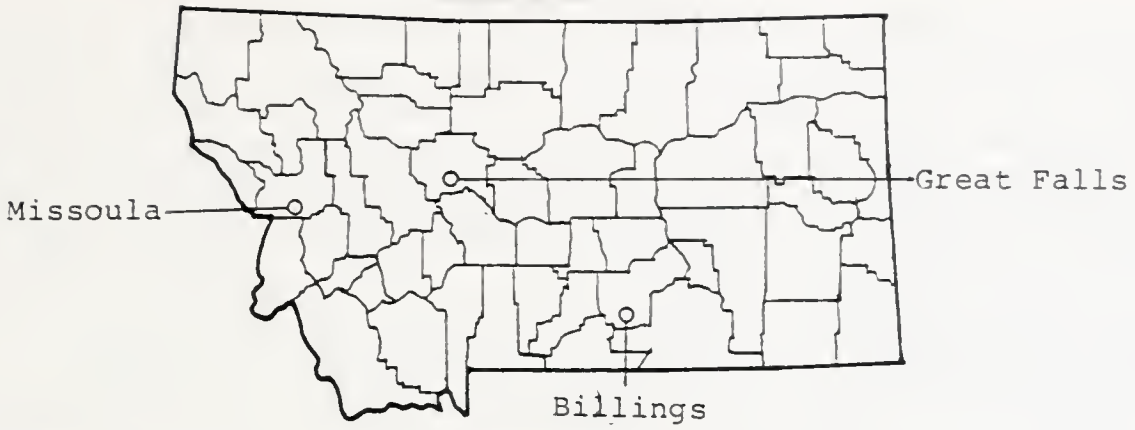
*EPA designation replaces state designation

LEAD



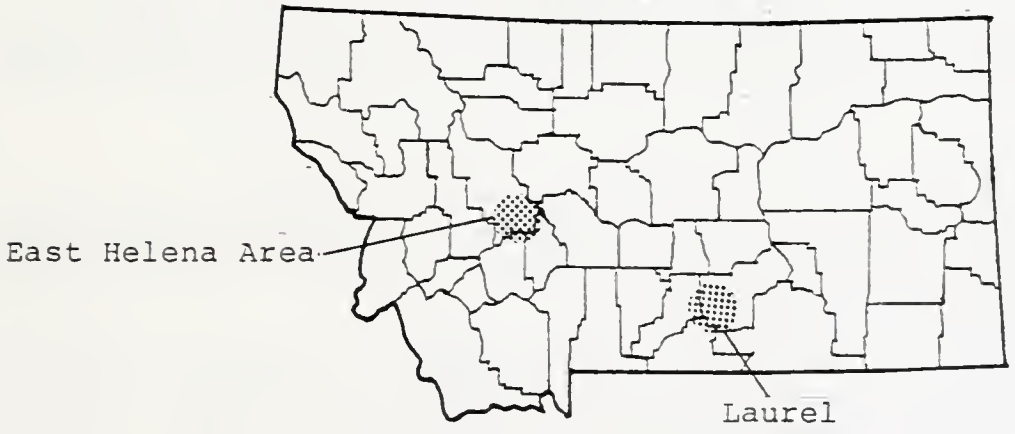
Designated Area	Does Not Meet Primary Standards	Reasons
East Helena Area	X	Smelter

CARBON MONOXIDE



Designated Area	Does Not Meet Primary Standards	Reasons
Billings	X	Exhaust From Motor Vehicles
Missoula	X	Exhaust From Motor Vehicles
Great Falls	X	Exhaust From Motor Vehicles

SULFUR DIOXIDE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Laurel Area	X		Refinery (further study)
East Helena Area	X		Smelter (should meet standards in FY '83)

Solid Waste And Hazardous Waste Management

The disposal of solid waste has become a major, complex problem in Montana. Due to its complex nature, it also relates to air, water and land pollution. In the future, the solid waste problem will become more expensive, expansive and complex. It is becoming clear that the concerted efforts of all levels of government, as well as in the private sector, must be employed to ensure proper waste management.

Our society consumes enormous quantities of material and energy which in turn generates an exceedingly large volume of waste. Currently, approximately 600,000 tons of municipal solid wastes are being generated every year in Montana,, and given the well-established waste generation rates, by 1990 nearly 870,000 tons of waste will be generated per year. This waste is being disposed in more than 230 identified municipal disposal facilities and numerous undisclosed dump sites.

In addition, from state surveys it has been established that approximately 200,000 tons of potentially hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. Furthermore, a large number of "empty" pesticide and other toxic chemical containers of all sizes are discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid Waste Management Bureau (SWMB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. To date, a total of 153 waste management systems have been licensed by the bureau.

In response to past state legislative action, the SWMB is providing both technical and financial assistance to local government entities for the development of waste management systems. This assistance includes a $350,000 grant program for the implementation of resource recovery and recycling systems.

Montana, through the SWMB, has received Phase I authorization to manage a state hazardous waste management program. In addition, the 1981 Montana State Legislature enacted significant hazardous waste legislation which will allow the state to adopt full authorization to oversee a state hazardous waste program. Preliminary data indicates that the following number of businesses are presently regulated under the hazardous waste program:

Generators	137
Treatment, Storage and Disposal Facilities	25
Transporters	27

Currently, no licensed hazardous waste disposal facility is located in Montana. This situation does not pose an immediate problem

because of the availability of such sites in neighboring states. However, with the inauguration of a statewide hazardous waste program the difficult task of siting a hazardous waste disposal facility may have to be initiated in Montana.

Small quantity generators of hazardous waste currently are conditionally exempted from the hazardous waste regulations. This exemption is placing growing adverse impacts upon the state. It is anticipated that small quantity generators will continue to attempt to use municipal disposal facilities for disposal of their special wastes. This development will place continuing responsibilities and risks on the owners of these municipal facilities. The risks may be especially great from the standpoint of occupational and public safety considerations at such disposal sites.

In addition, there are a growing number of municipal disposal facilities in the state which are refusing to accept hazardous wastes in any quantity. This development is certain to result in the expanded dumping of wastes into such areas as open dumps with uncontrolled access and no supervision. This dumping will further increase the threat to public health and safety through unsuspecting contact with such wastes

Because of the action by the federal government to eliminate support for Subtitle D activities, the state currently is hard-pressed to adequately address the issue of small quantity hazardous wastes. However, because of the importance of the issue, the SWMB intends to assist, to the extent possible, not only small quantity generators, but also owners of municipal disposal facilities. This assistance will principally be in the form of assisting in the disposal of such wastes at acceptable facilities and, by doing so, assure the prevention of illicit hazardous waste disposal.

Primary accomplishments for the programs in FY 1982 include:

EPA has granted Phase I authorization to the state to manage a hazardous waste program. This program will now be upgraded until it can qualify for final authorization. Under Phase Iand Phase II interim authorization, the state is establishing a manifest system; initiating transporter requirements, and providing licensing of treatment, storage and disposal facilities. The SWMB has established a working relationship with the industrial community which is to be regulated under the hazardous waste regulations

Refinements in the state emergency response program were continued especially in the further development of internal response procedures and attempts to equip the emergency response team.

Specific disposal problems and sites were evaluated in 85 cases during the year involving industrial waste disposal.

The bureau issued licenses to solid waste management systems throughout the state. This licensing process was utilized extensively to gather baseline data for the open dump inventory.

In addition, the bureau has continued to issue state grants to local government entities to conduct detailed areawide waste management planning. During the fiscal year, the bureau has received legislative authorization to expand this grant program to provide implementation grants for recycling and resource recovery projects. During this biennium, $350,000 in state funds are available for this grant program.

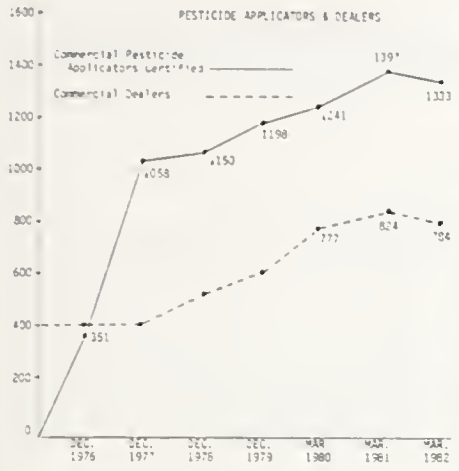
During the year an interagency agreement between the State of Montana, U.S.Forest Service and Bureau of Land Management was developed and adopted to assist in the regulating of disposal sites on public land.

Pesticides

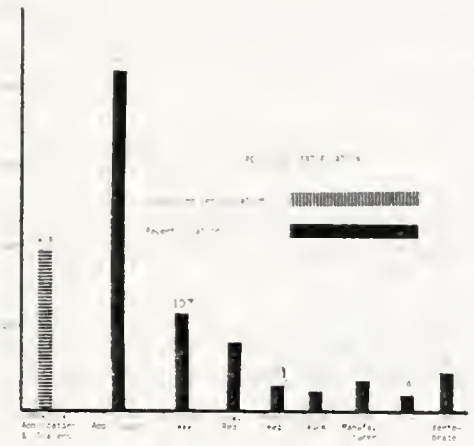
Montana is primarily an agricultural state and as such requires the use of pesticides to help manage a multitude of pest problems. Based on data collected from commercial applicators, it is estimated that from 2.8-3 million acres are treated commercially each year. There are no accurate statistics available for private applicators, but generally the private applicators treat smaller acreages, do spot treating and field margin treating. In most years, private applicators would probably apply pesticides to 1.5-2 million acres.

The Environmental Management Division, DOA, has a responsibility to not only serve Montana agriculture, but is also mandated to protect the environment and the health of the state's citizens. To do this, the use of pesticides must be closely monitored. Toward this end, the Environmental Management Division administers a pesticide applicator certification program and an enforcement program. Both programs are now administered by the Enforcement Division of EPA to achieve consistency and continuity of purpose between the two programs. Since their inception, the programs have significantly reduced the amount of pesticide contamination in Montana despite the fact that the number of certified commercial and private applicators has increased significantly since 1976 (Figures 2 & 3).

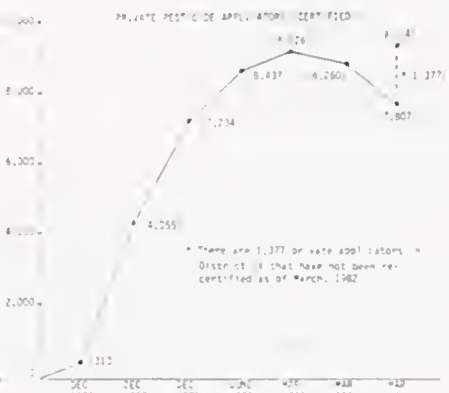
Recertification of commercial applicators and dealers was implemented several years ago. Private applicators are on a 5 year cycle, with one of the five agricultural districts being recertified each year. Commercial applicators and dealers are on a 4 year recertification schedule. The applicator categories have been divided among the 4 year period, so that not all categories are due for recertification the same year. Continuing certification courses are offered each year so that commercial applicators and dealers can accumulate the required 100 points during the four year recertification period (Figure 4).



(Figure 2)



(Figure 3)



(Figure 4)

The Environmental Management Division of DOA provides pest management services to producers, industry, government agencies and the general public. These services include establishing integrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers 3,482 pesticide products prior to their use in the state; licenses 784 pesticide dealers; licenses 1,333 applicators and their employees (300); licenses 9,184 private applicators, and regulates the sale of pesticides in Helena and in the five district field offices. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public. Thus, a more comprehensive pesticide regulatory and service program is provided to Montanans by combining the state and federal pesticide laws and pest management laws than would be provided by each program separately.

The Montana DOA projects the following EPA funded program activities by the end-of-year FY 1982:

	End-of-year FY 1981
Dealer Inspections	560
Pesticide Applicator Inspections	717
Use/Misuse Inspections	230
Market Place Inspections	250
Establishment Inspections	27
Pesticide Accident Investigations	70
Special Investigations	12
Efficacy Studies	12
Collection and Analysis of Samples:	

Formulation Analysis Performed	600
Residue Analysis Performed	1300
Pesticide Samples Received From EPA	300
Certification Training and Examination	
Commercial Applicators (New)	111
Private Applicators (New)	510
Continuing Certification Training (Dealers and Applicators)	489

Special projects conducted in 1982 include: Monitoring of compound 1080 for Columbian ground squirrel control and a laboratory study to determine the stability of compound 1080 in biological samples.

A monitoring program to determine endrin residue levels in soil, vegetation, livestock and wildlife was continued in FY 1982. The sampling periods occurred in October 1981 and April 1982. DOA personnel collected approximately 500 samples. Analysis of the samples and compilation of the data will be continuing.

The DOA applied for, and received, two Specific Exemption (Section 18) requests for chemicals that could be used as alternatives to endrin for cutworm control in small grains. Use of the chemicals will be monitored to determine efficacy and residue characteristics.

Pesticide specialists conducted a statewide dealer and applicator survey and inspection program. All dealers and applicators were inspected for compliance with pesticide laws and regulations and the specialists collected data on what pesticides were sold and applied in the state the previous year.

Rules were promulgated for both dealers and applicators to require mandatory reporting of sales and use of restricted use pesticides on a monthly basis and general use pesticides on a yearly basis. This information will provide pesticide use trends on a regional basis and will help delineate areas where pest problems are occurring.

Rules restricting the use of some aquatic herbicides and providing certain requirements of applicators were finalized. The requirement of management plan submission and the consequent inspection of aquatic systems and applications will be continued.

Clinics emphasizing and illustrating proper calibration of pesticides application equipment will be instituted for both private and commercial applicators.

Several pesticide training manuals were revised and printed.

The DOA developed new analytical techniques for the analysis of various biological and environmental samples.

Radioactivity

Elevated levels of radioactivity are currently being studied in Butte, Montana by state and federal agencies.

The DHES has independently been investigating the radiation levels in Butte for more than three years. Although a variety of studies are still in progress, it appears that the elevated radiation levels are due to a combination of natural and displaced radioactive materials.

The DHES studies have been funded by the state, Department of Housing and Urban Development (HUD) and EPA. EPA has assisted in the effort through funding and by sending a radiation scanner van to Butte for several days, and by loaning the DHES indoor radon sampling units.

Program accomplishments for FY 1982 include:

A year's data regarding radon daughter concentrations was completed in approximately 150 Butte homes utilizing Radon Indoor Progeny Integrating Sampling Units (RIPISUs) supplied by the EPA.

During the first two years of the EPA/DHES contract, radon daughter concentrations in approximately 1,000 Butte homes and 100 Anaconda homes were estimated by use of the grab sample method.

The area of Butte primarily affected by elevated radon and radon daughter concentrations was further identified and mapped.

The study of the effectiveness of air cleaning devices to determine their usefulness for reducing indoor radon daughter concentrations was completed.

Approximately one year's data has been collected for evaluating different test methods for measuring radon and radon progeny. The information collection phase will be completed this fiscal year. Analysis of the data and the final report will be prepared during FY 1983.

In addition, the EPA has provided the DHES with the loan of both gamma and radon progeny detection and measuring equipment. Through its Las Vegas laboratories, the EPA has given extensive technical support in the forms of laboratory radioanalyses and supplying and reading dosimeters used to measure radon progeny concentrations.

Toxics

Asbestos

EPA regulations requiring public and private elementary and secondary schools in the United States to identify friable asbestos became effective June 28, 1982. Included in the regulations are requirements to identify friable asbestos in building materials, maintain records, notify employees of the location of materials containing asbestos, provide employees with instructions on reducing exposures and notifying parent-teacher associations of inspection results.

Local education agencies must comply with all portions of the rule by May 27, 1983.

EPA's Montana Office will coordinate with the DHES and Montana Office of Public Instruction to assist local education agencies in complying by providing information and technical assistance. School administrators will be informed of the madatory program and will be provided assistance as needed.

A program for inspecting schools for compliance with sampling requirements will be developed and implemented.

Polychlorinated Biphenyl (PCB)

The major toxic chemical used in Montana continues to be PCB's. During FY 1981 several minor PCB incidents involving some public exposure occurred. The clean-up of these releases was done by the persons responsible. Through local and federal cooperation the clean-ups were performed in a safe and satisfactory manner.

More than 40 inspections of facilities using PCBs were performed in FY 1981. endanger public health and the environment.

National Environmental Policy Act (NEPA)

In meeting EPA's review responsibility under NEPA, the following major EIS's and assessments were reviewed:

- Many Wilderness Proposals
- Northern Tier Pipeline
- Anaconda Stillwater Mine
- Kootenai Falls
- BPA Transmission Lines
- PGM Resources Mine
- Two USFS Forest Plans
- Numerous BLM Projects
- Bob Marshall and Numerous Other USFS Seismic Projects

In an effort to identify potential environmental issues and remove assessment deficiences related to construction grants, the Helena, Bozeman, Hamilton, Great Falls and other projects were reviewed. The Missoula project is being closely analyzed through a detailed finding of No Significant Impact.

Public Participation

The review of the draft agreement will be sent to persons who have indicated an interest in environmental health programs and to state and federal agencies. The agreement will also be presented to the Board of Health and Environmental Sciences and appropriate citizen advisory groups for their review and comment.

PRIORITIES

1. Water

-Initiate a program to insure that construction grant monies are spent to improve instream water quality. This would involve instream monitoring.

- Initiation of a groundwater pollution control program in accordance with regulations adopted by the Board of Health.

- Instream monitoring to evaluate the need for and adequacy of current requirements.

- Increase WQB involvement in known and anticipated problems such as giardia in municipal watersheds.

2. Air

SIP Implementation and Development
- Analyze Billings sulfur dioxide study and take appropriate action

- Missoula, Great Falls and Billings CO and TSP

- Butte, TSP

- East Helena, Lead

Source Surveillance
- PSD and new source review

- Inspection of A-1 (Class A) sources

- Emission inventory update

Monitoring
- Continue implementation of National Air Monitoring Station (NAMS) and State and Local Air Monitoring Station (SLAMS) network

- Operate Quality Assurance Program

- Audit Continuous Emissions (CE) Monitors

- Audit Quality Assurance (QA) Programs For Company-Owned Monitors

3. Solid Waste/Hazardous Waste Management

Implement and maintain a comprehensive state hazardous waste management program.

Closing or upgrading of existing open dumps by the implementation of the state Solid Waste Management Plan and application of appropriate state regulations.

4. Pesticides

Maintain the quality pesticide enforcement and laboratory programs established between the EPA and the Department of Agriculture.

Implement a program to resolve pesticide drift problems.

Develop an educational compliance and enforcement program on disposal of pesticides and pesticide containers.

Maintain and increase the program of environmental sampling and monitoring.

Develop a list of pesticides which may have actual or potential adverse effects on the environment, human health or agriculture.

Assist in conducting "Fly-Ins" for aerial applicators to improve spray patterns and reduce drift problems. Assist in conducting "Spray-Check" equipment calibration workshops for farm and ranch applicators.

5. Radiation

Butte Radiation

-Reduce radon levels in dwellings in Butte.

- Continue study to determine contributing factors to elevated radiation levels in Butte.

- Continue study utilizing passive track etch dosimeters to determine soil radon exhalation rates and to accomplish long term measurement of indoor radon concentrations.

RESOURCE SUMMARY FOR MONTANA-EPA PROGRAMS

The resource summary for all Montana-EPA programs (or media) is shown in the Resource Summary Table (Table 4). Following this table, each program is discussed. The highest priorities within each program are emphasized in the narrative discussion. Detailed work plans which specifically address all program elements within a medium follow the narrative.

TABLE 4

RESOURCE SUMMARY TABLE

Program	Federal Grant $	State Resources $	State/ Local Work Years	Federal Work Years
Air				
State 105	550,000	383,989	29.50	4.00
Water Quality				
Water/Wastewater Op. Cert.	0	19,885	0.5	
State 106	278,000	88,144	12.1	
Program Management				
Gen & Point Source Plan				
Operation & Maintenance				
Permits				
Enforcement				
Monitoring				
Section 208 Grants	204,045*	68,015	5.15	
205 (g)	476,640	0	8.35	2.55
Drinking Water	268,600	104,045	9.4	
State PWS Grants				
State UIC Grants				
Hazardous Waste	201,474	67,090	7.0	4.45
Pesticides				
State Enforcement Grants	331,929	83,000	14.85	0.6
State Cert. Tr. Grants	16,000	16,000	0.59	.01
Radiation	381,800	0	3.0	.30
Categorical Programs				
Toxic Substances	0	0	0	.30
Asbestos in Schools	0	0	0	.10
Indians	382,500	0	.02	1.10
Flathead Study	410,000	0	2.0	.20
Federal EIS Review	0	0	0	.50
Laboratory Support	90,109	0	0	0
Emergency Response	0	0	.33	.36
Quality Assurance	0	0	.05	.03

*FY 1981 Funds

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

- Implement Lead SIP
- Implement PSD
- Air Quality Monitoring
- Complete Billings Sulfur Dioxide Study
- Continue Necessary Controls For Oil Well Flaring

Water

- Wastewater Discharge Permit and Enforcement Program
- Drinking Water
- Water Quality Management
- Construction Grants

Solid Waste

- Hazardous Waste Management
- Solid Waste Management
- CERCLA

Pesticides

- Enforcement
- Certification

Radiation

- Butte Radiation Program

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

SIP

Nearly all nonattainment plans have been approved or conditionally approved. The SIP plan for Great Falls is currently underway with a submittal plan to EPA scheduled in October, 1982. A modified plan for Butte should be submitted also by October 1982. The lead problem in East Helena has been studied and control strategies are currently under development. The plan should be completed and submitted to EPA before the end of Calendar 1982.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source inspections since the Clean Air Act no longer allows for continued noncompliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through court actions and, if appropriate, by the imposition of noncompliance penalties.

PSD

As a result of the Alabama Power Company court case concerning PSD at the national level, Montana is revising its PSD regulations. The regulations are to be submitted to EPA for approval and full delegation of the program. The state will be issuing PSD permits on behalf of itself and EPA when EPA formally approves the regulations.

Air Quality Monitoring

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical impact analyses are essential for the continued protection of Montana's pristine air quality and to accommodate orderly industrial growth.

The state has completed a review of its air monitoring program and has prepared and submitted a Network Review Report to EPA. Modifications to the existing network will be carried out according to the schedules set forth in the report.

Montana will continue to actively pursue a high quality data retrieval program. Large steps toward this goal were accomplished in 1982 with further steps scheduled for 1983. It may be necessary to reduce monitoring efforts at some locations in order to realize this goal.

Billings Sulfur Dioxide Study

As a result of alleged violations of emisison and ambient air quality standards in the Billings area, the Department and six area industries signed a stipulation in late 1977 requiring, among other things, an intensive sulfur dioxide monitoring study. The study was initiated through contract in the fall of 1981. The study is scheduled for completion in October, 1982. The study involved four monitoring sites near Billings and two near Laurel in addition to upper air meteorological soundings. At the end of this study, the Bureau will analyze the data and make necessary determinations regarding non-attainment status. If the area(s) is deemed as non-attainment, the Bureau will begin discussing control strategies for the appropriate sources.

Oil Well Flaring

During the past year, the Department is cognizant of an increased amount of flaring sour gas from oil wells. This practice has the potential of emitting significant amounts of sulfur dioxide into the atmosphere. The Bureau will continue to contact these sources to determine the necessity of permits and necessity of control strategy for these sources.

Water

Wastewater Discharge Permit and Enforcement Program

The priority of the Montana Pollutant Discharge Elimination System (MPDES) is to administer and enforce an effective wastewater discharge permit program. This is an ongoing program in which permit applications are reviewed and, if appropriate, permits are issued. Major dischargers which have the greatest potential environmental effect receive the highest priority in the program. The minor dischargers are reviewed, but not with as much detail as major dischargers. However, because of their large numbers, minor permits consume large amounts of time. This may be somewhat alleviated if certain of these categories can be handled by general permits under the general permit program regulations recently passed by the Board of Health.

Self-monitoring reports are submitted by all dischargers for review by the WQB. Compliance monitoring of major dischargers is performed by the bureau at a frequency necessary to assure accurate results. The minor dischargers are compliance monitored when it is apparent that analyses may be in error or the discharger is out of compliance with its discharge limitations. Support is provided by the DHES Laboratory Division in the analyses of samples. Inspections of treatment facilities are also performed to assure adequate operation of facilities. Investigations are also made when complaints are received on permittees or where possible violations are occurring by persons not having a permit.

Compliance schedules are set forth for those dischargers not meeting limitations or if stream standards are violated. For municipalities the compliance schedules are coordinated with the WQB Construction Grants Section so the projects which are creating the biggest problems are given the highest priority for federal funds. Input from the SWMB will be provided to assure that residual wastes are properly handled.

Enforcement action is taken where appropriate. Enforcement may be a letter from the WQB, a compliance order issued by the department or a district court action to seek compliance and may include a monetary penalty. Support is received from the DHES Legal Division and the EPA on enforcement.

Specific Priorities:

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are imposed and residual wastes handled appropriately (input from SWMB to be provided), and appropriate effluent limitations and self-monitoring are provided.

- Issue, reissue or modify other permits.

- Pursue general permit issuance for such categories as bridge project cofferdams, small placer mining operations, storm water, feed lots and sewage lagoons.

- Process 3 (a) authorizations and Water Quality Standard (401) certifications.

- Provide timely complaint response and followup.

- Provide compliance sampling monitoring twice yearly of all major industrial permittee discharges and once yearly for 10 major municipal dischargers, completing form EPA-3560-3 for each.

- Compliance monitor at least 10 minor dischargers where self-monitoring data is suspect - provide a quality assurance program to assure appropriate laboratory results.

- Pursue a vigorous compliance inspection program on mining activities during the summer months when activity is at its peak and gather information concerning impacts on water quality.

- Provide appropriate enforcement and report to EPA, giving priority to major dischargers.

- Provide timely review and appropriate notification on self-monitoring information.

- Assist in training enforcement and compliance personnel (EPA).

Safe Drinking Water Program Implementation

During the past year the drinking water program has emphasized bringing noncommunity public water supplies into compliance. Also there has been more emphasis on enforcement actions against community public water supply systems that are not in compliance with the regulations.

A combination of reduced funding and inflation is beginning to take its toll on the program. One job position has been lost and, if there are further cut-backs in funding, there will be more losses.

Objectives for the coming year have been changed somewhat to reflect the reduction in manpower. The major objectives for the coming year will be:

- Improve compliance of community water supplies for all of the requirements of the Safe Drinking Water Act.

- Provide enforcement through the DHES Legal Division when community public water supplies are not in compliance with the regulations.

- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.

- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.

- Grant variances and establish compliance schedules for those systems which need physical improvements to meet MCL's.

- Update regulations as needed.

- Conduct field investigations for approximately 90 percent of all public water supplies.

- Provide technical assistance regarding the operation and maintenance of public water systems.

- Provide training and certification for operators.

- Review plans and specifications for new supplies and improvements to existing systems.

- Develop DHES policies to improve plan review and rewrite regulations as needed. Specifically, write a design manual for non-community PWS.

- Provide certification for chemical and bacteriological laboratories.

- Work to improve compliance of noncommunity public water supplies.

Water Quality Management

Fiscal year 1983 will see a redirection of efforts in the area of water quality management. Such redirection will be necessary in view of resource reductions which are expected during FY 1983 and in future years. The WQB will now have an increased responsibility to insure that these resources are used in such a way to maximize direct water quality benefits.

In FY 1983 the WQB will see even closer coordination between the water quality management program and other bureau programs, especially permits and construction grants. As time and resources allow, the WQB will attempt to assist the permit program in establishing effluent limits on wastewater discharges, based on water quality information, and attempt to coordinate with the construction grants program the identification of municipal wastewater treatment facilities which are currently having an adverse impact on water quality and identify facilities that could have improved sewage treatment facilities with financial assistance from the grants program.

Since the WQB cannot conduct intensive surveys for every discharge to Montana streams, it will attempt to deal with situations where the cost of correction may be excessive compared to water quality benefits sought.

Construction Grants

The 205 (g) delegation agreement executed during FY 1981 provides for the state to perform 21 of the 22 major program functions. The state shall be responsible for the day-to-day management of construction grant activities. EPA will provide technical training on program functions and oversight of delegated activities. The state shall modify the 205(g) functional agreement to reflect PL 97-117 and shall work with EPA to develop a work plan to meet EPA's water accountability system in lieu of the present MES. These activities will be performed consistent with the availability of resources and funding.

Solid Waste

Hazardous Wastes

During the next fiscal year, a priority will be the continued development of the state hazardous waste management program. This development will first require the state to receive complete authorization for Phase II Authorization from EPA. This will encompass complete authority over generators, transporters and the manifest

system as well as authority to conduct permitting, monitoring and enforcement activities. The final major activity in developing a state hazardous waste regulatory program will be the preparation and submittal of the state's application to EPA for Interim Authorization Phase II C or final authorization.

In conjunction with the above stated activities, implementation will continue with the state hazardous waste regulatory program as provided for in Phase I Authorization. This implementation will include the continuation of notification procedures required of hazardous waste activities by the regulated community. In addition, inspections and preparation of enforcement actions will be maintained for hazardous waste generators, transporters and treatment, storage and disposal facilities.

The state will continue to maintain an emergency response system which includes a response plan and active emergency response team. This team is comprised of a cross section of state agencies representing a broad spectrum of disciplines. Such structure assures that state government can provide technical advice and direct assistance to a variety of emergency situations.

As the state's hazardous waste program develops, measures will be taken to assure that adequate work force resources are available. As needed, efforts will be made to secure adequate staffing for the hazardous waste program. In addition, the ongoing training of current staff will be maintained. Such educational efforts will take advantage of training programs that are offered by the federal government and institutes of higher learning.

In all of the above-mentioned activities, a concerted effort will be made to provide public participation. Current state laws and regulations already provide formal mechanisms for public review and comment in the issuance of all permits. In addition, state law requires the DHES follow formal procedures to insure adequate review of any action that will directly impact citizens of the state. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

Solid Waste

Under licensing procedures required by state law, the SWMB will continue to maintain an inspection program of all waste management facilities. As warranted, the bureau will initiate enforcement action on those facilities which are identified as open dumps and for which no effort has been taken to close or upgrade.

The SWMB will continue to maintain a planning grant program to provide financial assistance to local government entities for purposes of developing recycling and resource recovery activities.

To the extent possible, the SWMB will continue to monitor and facilitate the proper disposal of small quantity hazardous wastes.

It still has not been determined to the satisfaction of the DHES that there is a true need for a centralized hazardous waste disposal facility in Montana. During FY 1982, an evaluation will continue to be made to ascertain the quantity and composition of hazardous wastes in Montana and their geographical distribution. If a true need exists, regional collection centers will be established where generators may dispose of wastes. Periodically, the material will be transported to approved hazardous waste disposal facilities out-of-state. Continual evaluation will be made of the volume and type of hazardous wastes deposited at the collection centers, and the continued availability of approved disposal facilities out-of-state. If, as a result of this evaluation, need can be demonstrated, action will be initiated to develop a centralized hazardous waste disposal facilities within Montana.

CERCLA

On December 29, 1981, Montana Governor Ted Schwinden requested that seven sites in Montana be considered as potential candidates for remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) authority. EPA staff and DHES staff have worked since that date to evaluate existing data and develop new information in order to determine the environmental significance of releases from these sites. Preliminary negotiations with potential responsible parties are underway and will continue throughout the fiscal year.

EPA has maintained the lead role in these efforts. The SWMB is preparing proposed legislation to present to the next legislature that would establish state authority and a means for matching funding if the expenditure of superfund money becomes necessary. EPA and DHES anticipate continued cooperation with potential responsible parties to resolve information collection and remedial response activities in lieu of escalation to formal CERCLA funding and cost recovery.

Pesticides

Enforcement

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and for conducting inspections and carrying out enforcement actions is provided for in the Montana Pesticides Act, Section 80-8-101 through 306 MCA 1979.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA through inspections (including use/misuse, restricted and general use products, records and proper licensing), investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies and enforcement actions. These

activities would be continued under the quality assurance agreements made with EPA under previous grants. The DOA's pesticide specialists hold EPA credentials and have the authority to carry out the mandates of the Federal Insecticide, Fungicide and Rodenticide Act as well as the Montana Pesticides Act.

The DOA's pesticide analytical laboratory will continue to maintain (and improve) the quality assurance program for sample handling and analysis. The laboratory will continue to provide pesticide analytical services to EPA and other states on a fee basis which will cover the cost of supplies, materials and communications.

The DOA has been granted "primacy" under the policies and procedures estabished by EPA. It is the intent of the department to serve as the primary agency in conducting inspections, investigations and sample collection and analysis in accordance with EPA approved procedures and to take effective action against violators. The outputs listed in the media work plan reflect only those that are funded by the grant. The DOA will continue to issue and monitor Section 24(c)'s, Section 18's and experimental use permits.

The DOA will implement a program to resolve pesticide drift problems. This will include defining drift problems in Montana; implementing procedures to prevent herbicide damage to, and illegal residues in, off-target vegetative crops, ornamentals and grasses; implementing procedures to prevent off-target insecticide drift which may affect human health and cause illegal residues in the environment; and developing sampling techniques and procedures for the collection and analysis of environmental samples affected by drift.

The DOA will develop an educational compliance and enforcement program on disposal of pesticides and pesticide containers.

The DOA will maintain and increase the program of environmental sampling and monitoring. This will include continuing the monitoring program for pesticides in air, water, soil and food to provide base line data, and selecting monitoring stations based on types of pesticides used and the time (month, season) of greatest use.

The department will develop a list of pesticides that may have actual or potential adverse effects on the environment, human health or agriculture. A written document (chemical review) of each of these pesticides will be prepared and will be available to other agencies and the public.

The DOA will assist in conducting "Fly-Ins" for aerial applicators to improve spray patterns and reduce drift problems and assist in conducting "Spray-Check" equipment calibration workshops for farm and ranch pesticide applicators.

Since the DOA's enforcement program is subject to yearly review and funding by EPA, no long range objectives can be projected. All objectives stated are for the 1983 federal fiscal year.

The specific activities and accomplishment commitments can be found in the Pesticides Media Work Plan.

Certification

The certification program is a federally mandated program which requires pesticide applicators using restricted-use pesticides to comply with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976.

The strategy will be to maintain the data processing system for the storage of qualification data for dealers and applicators and for the issuance of certification credentials to qualified applicators as well as to newly certified individuals entering the system.

Most of the commercial and government applicators requiring certification have been approved, but the strategy will be to conduct at least one general certification course (24 hours) for new applicators who wish to be certified. Indications are that approximately 85 percent of the private applicators desiring certification have been certified. The strategy will be to conduct training for private applicators in those counties where the need is expressed.

The strategy for recertification will be to provide recertification training for the following applicator categories: Forest Pest Control, Ornamental and Turf Pest Control, Aquatic Pest Control, and Pesticide Dealers. Additionally, the private applicators in Agricultural District V will receive recertification training specific to their needs (crops, cropping systems and pest complexes present).

Radiation

Butte Radiation Program

The purpose of the Butte Radiation Study is to: Determine the contributing factors to the elevated radiation levels in Butte; ascertain the geographical area(s) of the city most severely impacted; determine the levels of radiation to which Butte residents are exposed; define the health risks associated with these elevated radiation exposures,and insofar as possible, determine methods to reduce radon and radon progeny levels in the affected dwellings in Butte.

Under contract with EPA, the Occupational Health Bureau (OHB), DHES, has established an ambient radon and radon progeny monitoring station at Hebgen Park. Data accumulated at this station will be evaluated to determine diurnal and seasonal fluctuations in radon and radon progeny concentrations. In addition, data accumulated at this station will provide information pertaining to the equilibrium in ambient air between radon progeny and the parent radon-222.

As a cooperative effort, the EPA's Las Vegas Laboratory and OHB will conduct preliminary evaluations of radon and radon progeny levels and sources in the city of Butte. These evaluations will be accomplished primarily through the review of existing data.

The OHB will place 250-300 track etch dosimeters in the Butte soil on a grid basis to determine radon soil-gas concentrations. The grid system to be utilized will be developed as a cooperative effort between OHB and EPA. The placement of these dosimeters will assist in identifying radiation problem areas in the city of Butte.

OHB will measure radon progeny concentrations in approximately 100 structures utilizing Radon Indoor Progeny Integrating Sampling Units to be provided by the EPA. Each structure will be measured for a period of one week, four times a year at three month intervals. Information gained by these measurements will provide a reasonable estimate of average annual radon progeny concentrations in structures sampled.

OHB will perform radon exhalation tests on various geological formations such as aplite, quartz monzonite, rhyolite, etc., to determine the contribution that these various geological formations are making to the elevated radon concentrations found in homes.

OHB will determine radon and radon daughter concentrations in homes using the grab sample method. This method of sampling will provide a rapid method of determining the geographical area of Butte most severely impacted by radiation exposure and will provide additional information concerning the equilibrium between radon and radon progeny in structures.

Environmental samples will be collected by the OHB for radioanalysis to be performed by the EPA Laboratory in Las Vegas. Samples will be collected as requested by the EPA project officer.

An additional contract has been negotiated between EPA and DHES under which EPA will supply track etch dosimeters and perform statistical analyses of data, OHB will place and collect the dosimeters from approximately 70 homes as well as compare the results of the track etch dosimeter measurements with direct reading radon monitors, direct reading working level monitors, passive environmental radon monitors and Radon Progeny Integrating Sampling Units. It is anticipated that this contract will result in cheaper, faster and better methods of measuring radón and radon progeny concentrations in structures.

MEDIA WORK PLANS

Air

Water

Solid/Hazardous Wastes

Pesticides

Radiation

Categorical Programs

MEDIA WORK PLANS

Air

Water

Solid/Hazardous Wastes

Pesticides

Radiation

Categorical Programs

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Air Activities						
A. Point Source Compliance - State shall inspect each Class A-1 source and approximately 1/2 of Class A-2 sources at least once per year. In addition to the State inspections, EPA-Montana Office shall perform 12 facility overview inspections of Class A sources.	30	80				AQB,EPA
B. Area Source Compliance - Inspect significant area sources at least once per year.		As Required				AQB
C. Enforcement - State shall take formal enforcement actions against significant A-1 and A-2 violators within 60 days following the violation. After 60 days appropriate enforcement action may be initiated by EPA.		Necessary Action				AQB
D. Emission Inventory Update - Update the emission inventory for Class A-1 and A-2 sources. Provide quarterly updates through Emission Inventory System (EIS) on compliance status.	30	80				AQB
E. Track TSP and CO implementation plans in nonattainment areas.	As Required					AQB
F. Butte TSP - State Implementation Plan						
1. Submit SIP to EPA.		10/82				AQB
2. EPA take action.		12/82				EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
G. Intergovernmental Cooperation - Review and update the Section 174 agreements for transportation-related pollutants.	1 Program					AQB
H. Identify A-1 and A-2 source classification.		Update EIS				EPA
I. Missoula CO Study						
1. Continue tracking CO progress and modify SIP if warranted.		As Required				AQB
J. Lead SIP						
1. Submit SIP to EPA.		10/82				AQB
2. EPA take action.		3/83				EPA
K. Great Falls CO						
1. Submit plan to EPA.		10/82				AQB
2. EPA take action.		12/82				EPA
SUBTOTAL			13.0	2.0	406,693	
L. New Source Review						
1. Permits - Issue approximately 80 new source permits. Copies of permits will be sent to EPA.	40	80				AQB
2. New PSD Review - Review and issue approximately 15 PSD permits. Copies of permits will be sent to EPA.	10	15				AQB,EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
3. Baseline Monitoring and Data - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD sources.	5	10				AQB
4. Increment Modeling and Tracking - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD areas.	5	10				AQB
M. Oil Well Flaring						
1. Continue evaluation of oil well flaring (sulfur dioxide) in Williston Basin.						
2. Coordinate with North Dakota similar air quality impacts.						
SUBTOTAL			3.50	1.80	170,112	
N. Monitoring						
1. Complete annual network review.	1 Report					AQB
2. Complete annual review of quality assurance plan and standard operating procedures.		7/83				AQB
3. Quarterly reporting of NAMS data and agency precision and accuracy data.						AQB
4. Complete site, system, and performance audits of selected PSD monitoring programs.	As Required	Ongoing				AQB,EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
5. Perform system audits of State air monitoring program.		9/30/83				EPA
6. Emission Monitoring Program - Audit continuous emission monitors at designated sources.		Ongoing				AQB
7. Company Data Retrieval/Storage - Implement the program to retrieve and store company-collected data.		Ongoing				AQB
SUBTOTAL			12.3	.50	349,897	
O. Controlled Trading						
1. Develop controlled trading generic SIP under new EPA policy guidance.						
P. Training			.20		7,287	AQB
Q. SIP Progress						
1. Prepare annual SIP progress report.		4/83				AQB
R. Conduct annual performance evaluation.		5/83				EPA
TOTALS			29.00	4.30	933,989	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Water Pollution Control						
A. Administration						
1. Provide general program direction and supervision and development of staffing and budget needs.			.70			WQB
2. Administrative support.			2.00			WQB
3. General policy guidance and periodic review of program outputs.			.10	.15		WQB,EPA
B. Wastewater Discharge Permit Program						
1. Issue, reissue or modify major permits ensuring that water quality standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided.	8	11	1.40	.30		WQB,EPA
2. Issue, reissue or modify minor permits or general permits as needed.	45	90	1.70	.10		WQB,EPA
3. Provide sampling or evaluation inspections on all major discharges.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
	(Date of Completion)					
a. Inspections will be completed on 15 major industrial permittees at least twice using Form 3560-3. Of the 30 inspections 15 of them will be sampling inspections. Ten major municipal permittees will receive sampling inspections. Approximately 10 minor dischargers will receive sampling inspections.	20	50	.70			WQB
b. Provide audit and evaluation inspections. Fifteen facilities, including those on Indian reservations will receive evaluation inspections from EPA.	5	15		.10		EPA
4. Provide appropriate enforcement actions.						
a. Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.						
b. Violations by major dischargers with discharges of toxic materials will be given high priority.			.90			WQB
c. Other violators will be handled as time allows.	As Needed	As Needed		.55		EPA-Mont. & Denver
d. State will be informed of EPA enforcement activities.						EPA
e. EPA will initiate necessary follow-up actions against those permittees where the state action is not adequate to meet the requirements of the Clean Water Act.	As Needed	As Needed		.10		EPA-Mont. & Denver

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
5. Provide review and appropriate notification on self-monitoring information as reports are received. EPA-Helena reviews self-monitoring reports for Indian reservation facilities for which responsibility has not been delegated.	Ongoing	Ongoing	.50	.10		WQB,EPA
6. EPA 309(a) Notice of Violations (NOVs).	As Appropriate			.10		EPA
a. EPA summary of outstanding 309(a) NOVs.	6	12		.10		EPA
b. State response on outstanding 309(a) NOVs.	6	12	.10			WQB
7. Quarterly Non-Compliance Reports.	2	4	.20			WQB
8. Reconnaissance inspections. Estimated number = 75.	30	75	.50			WQB,EPA
9. Conduct applicable elements of the pretreatment program in accordance with final guidelines.			.10	.05		WQB,EPA
10. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Ongoing	Ongoing	.60	.10		WQB,EPA
11. Provide coordination between permits/ enforcement program and construction grant program to improve municipal facility compliance.	Ongoing	Ongoing	.20	.05		WQB,EPA
12. Provide copies of all file documentation for major and designated minor permits to Montana Office.		As Required	As Required			

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
13. Follow-up on the most significant problems identified through the DMR QA program. The results of this program will be utilized as a tool in selecting inspection candidates.						
14. State program overview, policies, procedures and output reviews.		Ongoing		.10		EPA, WQB
C. Groundwater (excludes UIC)						
1. Develop and implement groundwater pollution control program in accordance with adopted regulations.			.50			WQB
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.			.20			WQB
3. Monitor groundwater problems and obtain groundwater samples for analyses.			.20			WQB
D. Dredge and Fill						
1. Issue 3(a) authorizations for short-term activities which exceed turbidity standards. a. 3(a) authorizations issued.	35	70	.30			WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
2. Review and issue certifications to Section 404 permits.				.20		EPA-Denver
a. Certification issued.	15	30				
b. Waive certifications where adequate review provided by other agencies.	25	50				
3. Coordinate program with Corps of Engineers, EPA, Department of Fish, Wildlife and Parks, and Conservation Districts.			.10			WQB
4. Inspect operations.						
a. Preconstruction investigations.	5	10	.10			WQB
b. During construction investigations.	5	10	.10			WQB
E. Water Quality Standards						
1. Identify toxic pollutant problems and need for waste load allocations. Develop toxic priorities for Water Quality Standards revisions.			.10	.05		WQB,EPA Montana & Denver
2. Implement nondegradation rule as adopted.			.10			WQB
F. Operation and Maintenance						
1. Inspections.						
a. Discharging facilities.			.50			WQB
b. Nondischarging facilities.			.20			WQB
c. Special assistance.			.20	.20		WQB,EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
2. Operator Training.						
a. Annual school.		1	.05			
b. Special seminars.		6	.10			
3. Big Sky Clearwater.						
4. Monitor 104(g)(1) grants (METCO, MDHES)				.02		
G. Fixed-Station Monitoring						WQB
USGS						
Seven USGS NASQAN stations have been designated as the core of the State's ambient monitoring network:						FWP
			.01			
Clark Fork River below Missoula Flathead River at Flathead, B.C. Milk River at Nashua Missouri River at Toston Tongue River at Miles City Yellowstone River near Livingston Yellowstone River at Billings		Ongoing				WQB
One additional station will be monitored monthly:			.04			WQB
Clark Fork River at Deer Lodge						
H. Biological Monitoring						WQB
1. Prepare summary of findings to date and determine statistical needs and confidence limits for trend analysis.			.20			

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Intensive Surveys			1.50			
1. In support of special NPS water quality improvement projects.						
2. Ammonia surveys for: a. Browning/Willow Creek b. Ronan/Crow Creek c. Wibaux/Beaver Creek d. Lewistown/Big Spring Creek						
3. Selected construction grants projects/priority water bodies.						WQB
4. Selected data-poor problem stream segments identified in the 1982 305(b) report.						
J. Maintain approved quality assurance program.			.01	.20		WQB,EPA
K. Maintain data management program.			.25	.23		WQB,EPA
1. Keep data files up to date.						
2. Continue editing of data files.						
3. Make periodic entries into STORET.						
4. Explore alternative data management systems.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
5. Process water quality data as submitted by the State into STORET.				.10		
6. Prepare water quality trends report - 1982 data.				.10		
L. Clean Lakes						
1. Complete Georgetown Lake Phase I grant.			.01	.01		WQB,EPA
TOTALS			14.56	3.05		
II. A. Safe Drinking Water - Public Water Supply Supervision				.80		EPA
1. Administration						
a. Provide general program direction and supervision and development of staffing and budget needs.		9/30/83	.80		29,705	WQB
b. Regulation Revision (1) Revise drinking water regulations as necessary.		9/30/83	.05		1,856	WQB
c. Prepare and submit the quarterly reports in the format and containing the information required by EPA.	1/1/83	4/1/83 7/1/83 10/1/83	.10		3,713	WQB
d. Participate in the annual program management review including assisting in the data gathering effort and in the discussion of the report.	3/31/83		.05		1,856	WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
e. Administer contracts with local health departments for inspections of public water systems.		24	.10		3,713	WQB
2. Surveillance and Technical Assistance	Ongoing					
a. Perform inspections of public water systems with written survey reports to the owners or operators. Follow up on deficiencies.			1.70		81,680	WQB
(1) Contracted county sanitarians		800				WQB
(2) Contracted individual(s)		400				WQB
(3) WQB staff		400				
b. Provide technical assistance to owners or operators of public water system regarding the plannings, operation, maintenance and treatment of water systems.	Ongoing	200	.40		18,564	WQB
3. Plan Review						
a. Review plans for new supplies and system improvements.		200	2.10		77,967	WQB
b. Perform inspections during construction and after construction is completed.		20	.10		7,425	WQB
4. Training and Certification						
a. Provide training for water system operators.		350	.70		29,702	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
b. Provide certification for water supply and distribution operators.		75	.10		3,713	WQB
c. Provide training to employees of local health departments in order to allow them to meet the obligations of their contracts.		30	.10		7,425	WQB
d. Provide training or ensure that training is provided to members of the drinking water staff on administrative and/or technical requirements of their jobs.		10	.10		7,425	WQB
5. Enforcement						
a. Review bacteriological monitoring results daily.		9/30/83	.30		11,138	WQB
(1) Notify systems with unsafe results to do check sampling as per the regulations and follow up on the notification to ensure that check sampling is done.						
(2) Notify systems that fail to monitor or that exceed the maximum contaminant level for a reporting period to give public notification. Follow up on that notice to ensure that the water system does give public notification.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
(3) Provide public notification for those systems that fail to give notice themselves.						
(4) Require correction of whatever is causing the continual bacteriological problem, including the use of continual disinfection.						
b. Review turbidity results monthly.	Ongoing	57	.10		3,713	WQB
(1) Notify systems that fail to monitor or that exceed the turbidity MCL to give public notification. Follow up on that notice to ensure that system does give public notification.						
(2) Provide public notification for those systems that fail to give notice themselves.						
(3) Require correction for those systems continually exceeding the turbidity MCL by first processing the exemption request & by issuing a compliance schedule.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
c. Prepare a schedule whereby all community surface water supplies and groundwater supplies have a sample analyzed for inorganic chemicals as required by regulations.		230	.20		7,425	WQB
(1) Notify systems that exceed the inorganic chemical MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification.						
(2) Provide public notification for those systems that fail to give notice themselves.						
(3) Require correction for those systems that exceed the MCL's. The first step in this is the processing of exemption requests and the issuing of a compliance schedule. Priority for correction should be based on the health hazard involved and the population at risk.						
d. Complete the radiological monitoring of all community water systems as per plan.		9/30/83	.30		11,138	WQB
(1) Notify systems that exceed the radiological MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
(2) Provide public notification for those systems that fail to give notice themselves.						
e. Provide judicial enforcement against those public water systems which continually fail to meet the requirements of the drinking water regulations.		10/30/83				WQB
6. Data Management						
a. Maintain an inventory of all public water systems.		1,700	.30		11,138	WQB
b. Maintain essential records needed for conduct of the public water system supervision program. These include individual records of laboratory results, summaries of bacteriological and turbidity reports and copies of correspondence to and with public water systems including reports of inspections and public notifications.			.70		25,989	WQB
c. Program computer system to print out summaries of laboratory analyses.			.10		3,713	WQB
d. Clerical support.		9/30/83	1.00		37,127	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
7. Provide laboratory capability to perform analysis required regulations, or require analyses at State certified laboratories.		9/30/83			35,208	WQB
a. Bacteriological samples.		5,000				Lab
b. Inorganic chemical samples.		225				Lab
c. Pesticides.		151				Lab
d. Organic chemical and trihalomethane samples.		25				Lab
TOTALS			9.40	.50	421,333	
B. Underground Injection Control (UIC)						
1. Administer program according to the Federal Safe Drinking Water Act.				.70		
a. Inventory Update Classes I, II, III, and IV.	12/31/82					EPA
b. Inventory Class V.		9/30/83				EPA
c. Quarterly Noncompliance Report (122.18(a)).	11/30/82 2/28/83	5/31/83 8/31/83				EPA
d. Annual Noncompliance Report (122.18(c)).	12/31/82					EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
e. Annual Program Report (122.18(c)).	12/31/82					EPA
f. Data Management.						EPA-Denve
2. Permit approval.						
a. Permits issued.		40		3.00		EPA-Mont. & Denver
3. Aquifer Exemption.						
a. Submission of proposal to Exempt Aquifers (122.35).	12/31/82			.30		EPA-Mont. & Denver
4. Surveillance and Investigation (35.670-4(a)).				1.00		EPA
a. Mechanical integrity tests witnessed.	25					EPA
b. Mechanical integrity tests performed.	100					EPA
c. Compliance reports reviewed.						
TOTALS				5.00	91,300	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
III. Water Quality Management Planning						
A. Agriculture NPS Control Program			2.50	.05		
1. Coordinate Cascade, Lewis & Clark, Hill, and Rosebud conservation district water quality management plans.		6/30/83				WQB, Local Districts
2. DNRC Conservation Districts Division assistance to local conservation districts with emphasis on 310 law administration.		6/30/83				WQB, DNRC, Local Districts
3. Technical (agricultural, hydrologic, water quality) assistance to conservation districts, state and federal agencies, WQB programs, and the general public.						DNRC, WQB
4. Conduct 2 agricultural NPS pollution appraisals for districts.						WQB
5. Coordinate management agreement with BLM.						WQB, EPA
B. Forestry NPS Control Program			1.50	.02		
1. DSL Forestry Division water quality education program.		6/30/83				WQB, DSL
2. Coordinate management agreement with USFS.						WQB, EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
C. Mining NPS Control Program			.50			
1. DSL Reclamation Division contract for education and inspection of placer mining operations.		4/30/83				WQB,DSL
D. Instream Flow Program			.50			
1. Prepare final application for instream flow reservation on the Clark Fork River.						WQB
2. Monitor water development activities on the Yellowstone River to ensure no interference with DHES Yellowstone reservation.						WQB
E. Water Quality Management Administration			1.50	.25		WQB,EPA
1. Update Continuous Planning Process (CPP) in accordance with statutory requirement (contingent upon 205(j) funding).						
2. Provide guidance and approve CPP.						
3. Update State 208 Plan and monitor management agencies (contingent upon 205(j) funding).						
4. General program administration and supervision.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
F. Implement and Complete Areawide WQM Plans	Refer to detailed work plans for milestones		.15	.05	*20,000 (Est.)	BR208 FH208
1. Blue Ribbons WQM Plan.						
2. Finalize Flathead Drainage WQM Plan.						
TOTALS			6.55	.37		
IV. Construction Grants						WQB,EPA
A. Develop new functional agreements for post May 12, 1982, grants in accordance with new regulations.						WQB,EPA
1. Submit draft agreements.	(TO BE INCLUDED LATER)					WQB
2. Submit final signed agreements.	(TO BE INCLUDED LATER)					WQB
B. Participate in Regional Construction Grants Oversight/Office of Water Accountability Systems.						WQB,EPA
1. Submit detailed workplan containing core elements of the program including quantitative estimates of performance per Regional Construction Grants Oversight System. (Date to be set by Regional Office in accordance with HQ Schedule).						WQB

*FY 1981 Funds

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
2. Manage the program in a best effort attempt to accomplish the estimated performance indicators. Monitor progress in these areas and participate in quarterly reviews.	(Date of Completion)					WQB,EPA
	TOTALS		8.35	1.55		
V. Water and Wastewater Operator Certification						
A. Issue certification licenses to operators and give examinations to new operators.			.50			WQB/ Water & Wastewater Certification Board
1. Licenses issued.		800				
2. Exams given.		200				
TOTAL			.50		19,885	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
VI. Laboratory Support	(Date of Completion)					
A. Provide certification by performing evaluations of laboratories which propose to do analyses which will be submitted for compliance with State regulations. Labs certified include:	Ongoing		.50			
1. Bacteriological laboratories.		14				
2. Chemical laboratories.		10				
B. Provide laboratory facilities with the capability to do analyses as required by the State regulations. The type of sample which the State Laboratory will analyze are:						
1. Bacteriological samples.		5,500				
2. Inorganic chemical samples.		230				
3. Organic chemical samples.		10				
4. Nitrate only samples.		450				
TOTAL			.50		90,109	

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Develop Hazardous Waste Regulatory Program which qualifies for EPA authorization						
A. Develop and promulgate regulations equivalent to RCRA 40 CFR 260-267 as needed.			.80	.15	30,693	SWMB
B. Develop complete Phase II Authorization application and submit to EPA.	3/83		.76	.40	29,158	SWMB
C. Participate in EPA public hearing and public notice process.	5/83		.07	.05	2,686	SWMB,EPA
D. Develop and provide program reports and participate in periodic program review as per the authorization package Memorandum of Agreement.	Ongoing		.11	.05	4,220	SWMB
E. Develop working agreements with the State insurance, banking, and financial regulatory agencies relative to the development and implementation of regulations for liability insurance and financial insurance coverage for hazardous waste TSD facilities.	Ongoing		.25	.15	9,592	SWMB
F. Develop and promulgate specific regulations for the control of small quantity hazardous wastes as required by 40 CFR 261.5.	Ongoing		.30		11,510	SWMB

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
G. Update State Quality Assurance Project Plan for hazardous waste per 40 CFR 122, 123, and 124, as necessary.	(Date of Completion) As Needed		.21	.15	8,057	SWMB
H. Evaluate State Quality Assurance Project Plan and activities.				.10		SWMB
TOTALS			2.50	1.05	95,916	
II. Implement Hazardous Waste Regulatory Program as outlined in the authorization Memorandum of Agreement.	Ongoing					
A. Review and update notification data, investigate non-notifiers and inspect when necessary.			.18	.15	6,906	SWMB,EPA
B. Inspect generators and transporters for compliance with applicable standards.			.43	.20	16,498	SWMB,EPA
C. Receive and review manifest exception reports.			.05	.05	1,918	SWMB,EPA
D. Review agreements with State transportation authorities for needed revisions.			.09	.05	3,453	SWMB,EPA
E. Inspect TSD facilities for compliance with applicable standards.			.58	.40	22,252	SWMB,EPA
1. Permitted facilities.						
2. Interim status standards facilities.						

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
F. Implement Hazardous Waste Facility Permit Program.			.70	.40	26,856	SWMB,EPA
1. Prioritize facilities.						
2. Request full permit applications.						
3. Review complete applications.						
4. Draft permit conditions.						
5. Issue public notice or proposed permit.						
6. Issue final permit.						
G. Document non-compliance and initiate appropriate enforcement action for violations of generation, transporter and TSD facility standards.			.36	.20	13,812	SWMB,EPA
H. Conduct follow-up inspections as necessary on enforcement actions.			.15	.15	5,755	SWMB,EPA
I. Report to EPA on authorized program progress as per Memorandum of Agreement.			.09	.05	3,453	SWMB,EPA
J. Regulate small quantity generation and management of hazardous wastes.			.60	.15	23,020	SWMB,EPA

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
K. Give technical assistance to local government and industry on hazardous wastes.	(Date of Completion)		.52	.30	19,950	SWMB,EPA
			3.75	2.15	143,873	
III. Develop and implement requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Superfund).	Ongoing					
A. Develop non-site specific enabling legislation to allow State to participate in Superfund Program.		*D	.10	.10	3,837	SWMB,EPA
B. Develop State submission for National Priority List.		D	.05	.10	1,918	SWMB,EPA
C. Review and make funding determinations for Superfund actions to control releases when responsible party fails to provide proper response.		I	.05	.10	1,918	SWMB,EPA
D. Negotiate Cooperative Agreement or State contract for specific sites to be funded from Superfund Trust Money.		I	.10	.10	3,837	SWMB,EPA
E. Identify new sources of releases that may require removal or remedial action (uncontrolled hazardous waste sites), including information from notification completed June 9, 1981, under CERCLA.		D	.10	.10	3,837	SWMB,EPA

*Note: Those items marked "D" are considered developmental activities while those marked "I" involve implementation activities.

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
F. Conduct preliminary assessment and inspection of uncontrolled sites.		*I	.20	1.50	7,673	SWMB,EPA
G. Conduct field investigations of selected uncontrolled sites including coordination of technical and analytical support.		I	.10	.80	3,837	SWMB,EPA
H. Initiate and carry out enforcement equivalent to those authorized under Section 7003 RCRA or Section 106 Superfund.		I		.30		EPA
I. Negotiate with responsible parties and develop remedial action plans.		D	.05	.20	1,918	SWMB,EPA
TOTALS		D	.30	.50	11,510	
		I	.45	2.80	17,265	

*Note: Those items marked "D" are considered developmental activities while those marked "I" involve implementation activities.

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
IV. Maintain Solid Waste Management Program	Ongoing					
A. Inspection and enforcement.						
1. Continued maintenance of a waste management inspection program.						
2. Prepare and initiate enforcement actions where violations of license conditions have occurred.						
3. Follow-up inspections where enforcement action has taken place.						
B. Planning and implementation of grant program.	Ongoing					
1. Issuance of financial assistance to local governments for purposes of conducting waste management planning.						
2. Provide implementation grants to local governments for resource recovery and recycling activities.						

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Maintain the quality pesticide enforcement and laboratory programs established between the EPA and the DOA.						
A. Field Activities						
1. Conduct use/misuse/accident investigations (as needed).	30	115	2.20		51,537	DOA
2. Conduct producer establishment inspections.			.35		8,199	DOA
a. Inspect records.	5	10				
b. Collect samples of each product produced.	30	40				
3. Conduct marketplace inspections (review labeling, registrations, non-registered establishments and products, surveillance of cancelled/ suspended products, collect samples as necessary).	50	180	.50		11,713	DOA
4. Develop and implement a program to resolve drift problems.			.70		16,398	DOA
5. Develop a compliance and enforcement program for disposal of pesticides and pesticide containers.		Survey & Inspect Applicators & Dealers	.70		16,398	DOA

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
6. Develop a program for environmental monitoring and sampling.			.43		10,073	DOA
7. Monitor State Plan.						
a. Determine if dealers are selling restricted use pesticides in violation of 12(a)(2)(F).	250	600	2.17		52,006	DOA
b. Determine if applicators are applying those compounds for which they are certified.	60	360	1.00		23,426	DOA
8. Samples collected (all areas projected).						
a. Formulation.	115	250				
b. Residue.	50	400				
9. Develop a list and document of pesticides which may have actual or potential adverse effects on the environment, human health or agriculture.	5	10	.15		3,514	DOA
10. Continue to develop and utilize the priority setting process for establishing enforcement activities.						
11. Assist in conducting equipment calibration workshops for commercial and private applicators.		8	.15		3,514	DOA

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
12. Enforcement cases/compliance (projected).			1.00		28,111	DOA
a. Issue compliance orders (as needed).		40				
b. Prepare, prosecute enforcement cases.		80				
c. Conduct compliance training (as required).		30				
d. Provide staff training for case preparation.		As Needed				
13. Other Enforcement Activities.			.20		4,683	DOA
a. Imports, exports, recalls, cancellations, suspensions.		As Needed				
b. Embargo.		As Needed				
c. Monitor EPA - EUP's.		10				
d. 24(c) registrations and Section 18 exemptions. agriculture use.		30				
e. Samples collected.		20				

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
B. Laboratory Operations and Programs.						
1. Analyze formulation and residue samples as needed for enforcement cases (number of analyses).	300	1,040	2.57		79,846	DOA
2. Analyze formulation samples for guaranteed analysis (number of analyses).	250	550	1.34		29,000	DOA
3. Analyze samples as required by the environmental monitoring program.		As Needed				
4. Analyze quality control samples (number of analyses).		150	.39		9,000	DOA
5. Other (EPA samples) (number of analyses).		300	1.00		27,441	DOA
6. Maintain quality assurance program and provide reports on activities at midyear and end-of-year grant reviews.						
ENFORCEMENT TOTAL			14.85		414,929	DOA

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
II. Maintain the established pesticide applicator certification and training programs.						
A. Certification Program.						
1. Maintain the computer program for the issuance of dealer and applicator credentials; issuance of farm applicator permits; maintenance of the inspection report systems.	3,525	4,700	.59		32,000	DOA
B. Training.						
1. Provide certification and recertification training for applicators and dealers.		2,900				
III. EPA review and evaluation.						
A. EPA midyear and end-of-year grant performance reports.						
B. EPA overview of and participation in grant activities (includes EPA evaluation of laboratory quality assurance program).				.07		EPA
ENFORCEMENT AND CERTIFICATION GRAND TOTALS			15.44	.07	446,929	

BUTTE RADIATION PROGRAM MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Implement study to determine contributing factors to elevated radiation levels in Butte.						OHB
A. Establish and operate station for measuring ambient radon daughter concentrations in the City of Butte.		Ongoing	.30		9,439	OHB
B. Measure radon progeny in approximately 100 structures using RIPISU's.		Ongoing	.50		15,732	OHB
C. Conduct preliminary evaluation of radon and radon progeny levels and sources in the City of Butte.			.30		9,439	OHB, EPA L.V.
D. Place 250-300 track etch dosimeters in the Butte area to determine radon soil gas concentrations.	Ongoing		.60		18,878	OHB
E. Perform radon exhalation tests on construction materials and various geological formations.		Ongoing	.30		9,439	OHB
F. Collect environmental samples for laboratory radioanalysis.		As needed	.10		3,145	OHB
G. Determine radon and radon progeny concentrations in structures utilizing the grab sample method.		Ongoing	.50		15,732	OHB

BUTTE RADIATION PROGRAM MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
II. Provide guidance to State for its radiation testing program with Region VIII Housing and Urban Development Office and complete report development for Butte/Anaconda Aerial Radiometric Survey		Ongoing		.30		EPA
III. Implement study to test different methods for measuring radon and radon progeny. This study will include both passive and active measuring devices.		Ongoing	7.0	___	299,996	OHB,EPA
TOTALS			9.6	.30	381,800	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Toxic Substances						
A. Protect health and well being of school children attending schools that contain asbestos materials.						
1. Provide assistance and technical advice to school district administrators in complying with the mandatory asbestos rule when adopted.				.05		EPA
2. Implement strategy for ongoing activities under mandatory program.				.20		EPA
B. Ensure mutual information exchange regarding significant toxics activities.				.05		EPA
1. Provide quarterly list of inspections performed.	2	4				EPA
2. Notify State of cases filed by EPA within 4 days of the action.						EPA
3. Contingent upon expected adoption or substantial modification of PCB marking and disposal regulations, conduct industry/government workshop on applicability.	1	1				EPA
4. Consult with State on methods of dealing with PCB users both from a consulting and an enforcement viewpoint.						EPA

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
C. Report within thirty (30) days incidents involving chemical contamination.						
D. Implement PCB work plan.						EPA
1. Inspect facilities which store or use PCB containing materials.	10	30		.02		
2. Prepare any technical documentation in support of enforcement actions for violations found during inspections within forty-five (45) days.				.01		EPA
E. Develop an information exchange to provide human health related data on environmental control activities and pollution incidents.	Ongoing					
TOTALS				.06		

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
II. Indian Activities	(Date of Completion)					
A. Air Programs						
1. Assist tribes with ongoing programs.				.25	250,000	EPA
a. Northern Cheyenne						
b. Fort Peck						
c. Flathead						
d. Fort Belknap						
B. Solid Waste						
1. Provide technical assistance to tribes.	2	4		.20		EPA
C. Pesticides						
1. Assist tribes in implementing pesticide certification and developing enforcement programs.				.15	30,000	EPA
a. Fort Peck						
b. Fort Belknap						
D. Complete review of State and Tribal WQM activities.			.02			WQB
TOTALS			.02	.10	280,000	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
III. Flathead Study	(Date of Completion)					
A. Assure that the Flathead Study is conducted in a timely and efficient manner in conformance with Congressional and EPA intent, and in pursuit of adopted Steering Committee goals.						
1. Serve as EPA representative on Flathead Study Steering Committee.	1 meeting per month			.10		EPA
2. Serve as EPA liaison with Study Area Manager.				.05		EPA
3. Serve as Project Officer (Co-Officer on all major research grants).				.05		EPA
4. Riparian habitat study.		7/83			*59,808	Univ. of Idaho
5. Flathead fishery study.		8/83			**80,000	FWP
6. Flathead limnology study.	4/83				**95,000	N. Texas State
7. Air quality monitoring and modeling.		9/83			**80,000	AQB
8. Administration/coordination of study.		7/83			**75,000	DNRC
TOTALS				.20	330,000	

*FY 1981 Funds
**FY 1982 Funds

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
IV. Federal Agency EIS Review	(Date of Completion)					
A. Impact Federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development, grazing and timber projects.						
B. Impact various Federal agencies to gain environmentally acceptable projects.						
1. Pre-EIS consultation/EIS review of Forest Service Management Plans.				.20		EPA
2. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.				.10		EPA
3. Pre-EIS consultation/EIS review of highway plans, airport plans, etc.				.10		EPA
4. Pre-EIS consultation/EIS review of water development projects.				.10		EPA
TOTALS				.50		

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
V. Quality Assurance Programs						
A. All Media						
1. Review State QA documentation annually.		9/30/83		.10		EPA/QAO
2. Provide reference samples one month after the request is received in Cincinnati.						EPA/CI
3. Support State's quality assurance activities and provide assistance as necessary.				.10		EPA/QAO MT

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
VI. Emergency Response						
A. Immediate removal action in response to releases or substantial threats of releases of hazardous substances.						
1. Provide Federal on-scene coordinator (OSC) to monitor responsible party action for all severe releases requiring immediate removal.	Ongoing			.10		EPA
2. Provide funding (if available) and OSC for immediate removal of releases when responsible party fails to provide proper response.	Ongoing			.10		EPA
3. Carry out all State responsibilities under the State Environmental Emergency Response Plan and provide State OSC to monitor responsible party action for releases where Federal OSC not required.	Ongoing		.10			State
B. Response to oil spills entering or threatening surface waters.				.10		
1. Provide funding (if available) and direct cleanup of all spills when responsible party fails to properly respond.	Ongoing		.05	.10		EPA

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
2. Provide OSC for all major and selected medium spills to monitor response by responsible party.	Ongoing		.05	.10		EPA
3. Provide OSC for selected medium and all minor (when necessary) spills and carry out responsibilities under State Contingency Plans.	Ongoing		.10	.10		State
C. Contingency Planning						
1. Update Region VIII Oil and Hazardous Substances Pollution Contingency Plan.	6/83			.10		EPA
2. Update State Environmental Emergency Response Plan.	As Needed		.10			State
D. Training of State and Local Emergency Response Personnel						
1. Ensure adequate safety training provided to State personnel responding to hazardous material emergencies.	Ongoing		.03			WQB
2. Provide adequate emergency response capabilities.			2.80	.10		EPA
TOTALS			3.23	.70		